- 3-6-98 correspondence from JB to BEW cc'd SVE w/ encl (A/CP)
- Notes from Meeting with L. Whitaker, J. Pissaick, D. Crampton, SVE, JDB, CAR
 - 5-4-98 miscellaneous document with handwritten notes from BEW w/ a list of exhibits attached (WP)(A/CP)
 - 4-28-98 facsimile from BEW to Lloyd Whitaker, cc'd Gerald Juetter, JB, SVE, CR, Joel Piassick w/ encl (WP)
 - 4-24-98 facsimile correspondence from Lloyd Whitaker to JB, SVE, BEW, Joel Piassick and Gerald Juetter (WP)
- · Van Etten Bankruptcy Info
 - 10-23-91 correspondence (A/CP)
 - 8-21-91 compromise brochure (WP)
- Research on GA Code Section OCGA 43-3-32
 - 7-2-98 eight page facsimile from Dave Gellan to AEF (A/CP)
- Invoices General IHI
 - 7-28-98 correspondence from Rob Hukezalie to BEW w/ encl (A/CP)
 - 7-16-98 correspondence from Rob Hukezalie to BEW (A/CP)
 - 3-4-99 correspondence from Wyche & Story to SVE (A/CP)
 - 3-16-99 correspondence from Howard Stallings to SVE (A/CP)
 - 3-16-99 correspondence from Howard Stallings to SVE (A/CP)
- Invoices from Wood & Francis IHI
 - Invoices dated 11-6-98; 7-6-98; 6-4-98; 5-4-98; 4-7-98; 3-5-98; 2-6-98; 1-6-98; 12-3-97; 7-6-98 (A/CP)

- Brisidine v. IHI Correspondence
 - 9-14-98 correspondence from BEW to CR cc'd JB w/ encl (A/CP)
 - 7-1-98 correspondence from BEW to CR w/ encl (A/CP)
- Correspondence Green et al. v. IHI Alabama
 - 1-13-99 facsimile from BEW to DL cc'd J. Mason Davis, Terri Gardner, SVE (A/CP)
 - 11-13-98 three page facsimile from Pamela Smith to BEW (A/CP)
 - 11-12-98 correspondence from Christopher Willis to BML cc'd BEW & DL (A/CP)
 - 11-12-98 two page facsimile from Pamela Smith to BEW (A/CP)
 - 10-30-98 two page facsimile from Pam Smith to BEW (A/CP)
 - 5-15-98 correspondence from GMM to BML cc'd SVE & BEW (A/CP)

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- 10-9-998 two page facsimile from DL to BEW (A/CP)
- 10-2-98 facsimile from BEW to DL cc'd BML (A/CP)
- 10-2-98 two page facsimile from BEW to DL (A/CP)
- 9-14-98 facsimile from BEW to DL cc'd JB & GMM (A/CP)
- 8-31-98 facsimile from BEW to DL cc'd BML, JB & GMM (A/CP)
- 8-31-98 four page facsimile from BEW to DL (A/CP)
- 8-26-98 two page facsimile from DL to BEW (A/CP)
- 8-5-98 three page facsimile from Chris Willis to BEW (A/CP)
- 8-5-98 two page facsimile from Pam Williams to BEW (A/CP)
- 8-5-98 facsimile from DL to BEW (A/CP)
- 7-29-98 facsimile from BEW to DL cc'd BML, JB & GMM (A/CP)
- 7-29-98 two page facsimile from BEW to DL (A/CP)
- 7-9-98 correspondence from DL to BML (A/CP)
- 7-9-98 four page facsimile from DL to BML, MV and BEW (A/CP)
- 7-2-98 fifty-two page facsimile from Pam Williams to BEW (A/CP)
- 6-30-98 eight page facsimile from Pam Williams to BEW (A/CP)
- 6-26-98 four page facsimile from Williams to BEW (A/CP)
- 6-26-98 ten page facsimile from Williams to BEW (A/CP)
- 8-31-98 facsimile from BEW to GMM (A/CP)
- 8-31-98 seven page facsimile from BEW to GMM (A/CP)
- 8-24-98 correspondence from DL to BML cc'd BEW, Mason Davis, John Chiles, Chris Willis, Jim Martin (A/CP)
- 8-24-98 correspondence from DL to Richard Freese, Esq. (A/CP)
- 8-24-98 correspondence from GMM to BEW & MV (A/CP)
- 8-21-98 two page facsimile from Derrick Stryker to BEW (A/CP)
- 8-14-98 correspondence from GMM to BML (A/CP)
- 7-29-98 two page facsimile from BEW to BML (A/CP)
- 6-19-98 eleven page facsimile from BML to BEW (A/CP)
- 6-9-98 three page facsimile from BML to BEW (A/CP)
- 6-4-98 twenty-four page facsimile from BML to BEW (A/CP)
- 4-13-98 correspondence from GMM to LS and CS (A/CP)
- 4-6-98 facsimile cover sheet from CR to BEW (A/CP)
- 4-14-98 internal document for Wood & Francis (A/CP)

Van Etten – Vrsecky, Anthony

- 8-20-99 four page facsimile from RB to SVE & BEW (A/CP)
- 8-18-99 seven page facsimile from RB to SVE & BEW (A/CP)
- 7-30-99 correspondence from BEW to RB w/ encl cc'd SVE (A/CP)
- 7-28-99 Rhonda Peditto copy of email transmission from BEW to Rhonda Peditto w/ the
 following documents attached: 8-3-99 list of stored documents; 4-20-93 SVE answer in
 Kapp et al v. Wolf et al litigation; 3-1-93 complaint in Kapp v. Wolf litigation; undated
 document list from the Kapp litigation (A/CP)
- 6/2/99 eleven-page fax RB to BEW (A/CP)
- 1/4/99 three-page fax RB to SVE and BEW (A/CP)
- 3/18/99 four-page fax RB to SVE and BEW (A/CP)
- 9/14/99 Peditto copy of email transmission from RB to SVE, BEW cc'd Peditto (A/CP)
- 9/13/99 four page fax RB to BEW (A/CP)

- 9/15/99 BEW copy of correspondence from RB to Mark Abrahamson, Esq. NASD Resolution, Inc. re: Vresky and F.N. Wolf NASD Arbitration Case No. 95-02303 (A/CP)
- 9/13/99 BEW copy of correspondence from RB to James Davis, Esq. re: Vresky v. F.N. Wolf et al cc'd Lisa Golden, Michael Carey, Darrin Dowell and SVE with attachment (A/CP)
- 8/30/99 BEW copy of correspondence from RB to James Davis re: NASD Arbitration Case No. 95-02303 cc'd Lisa Golden, Michael Carey, Darrin Dowell and SVE (A/CP)
- 8/30/99 BEW copy of correspondence from RB to James Davis re: NASD Arbitration Case No. 95-02303 cc'd Lisa Golden, Michael Carey, Darrin Dowell and SVE with attachment (A/CP)
- Research Green, et al. v. IHI Alabama
 - Several Alabama Supreme Court decisions (WP)
- Attorney Notes Green, et al. v. IHI Alabama
 - 10/14/98 handwritten notes BEW (WP)
 - 10/22/98 handwritten notes BEW (WP)
 - 10/14/98 handwritten notes BEW (WP)
 - 6/29/98 handwritten notes BEW (WP)
 - 6/17/98 handwritten notes BEW (WP)
 - 6/10/98 handwritten notes BEW (WP)
- · Brisidine v. IHI Pleadings
 - 6/25/98 S. Scott Seargent(?) to BEW with enclosures (A/CP)
- SEC v. IIII Attorney Notes
 - Empty
- Brisidine v. IHI Correspondence
 - 9/1/98 William M. Lawrence to BEW with enclosures (A/CP)
 - 8/10/98 S. Scott Seargent to BEW (A/CP)
 - 6/23/98 four-page fax BEW to S. Scott Seargent (A/CP)
 - 6/23/98 BEW to Seargent cc CR (A/CP)
 - 7/1/98 facsimile BEW to Seargent (A/CP)
 - 6/22/98 six-page fax BEW to Chris Willis (A/CP)
 - 7/1/98 three-page fax BEW to Seargent (A/CP)
 - 7/1/98 correspondence BEW to Seargent (A/CP)
- Craig T. Leibendorfer, et al. v. International Heritage, Inc., et al.
 - 1/21/99 three-page fax from Halpern to BEW (A/CP)
 - 12/31/98 six-page fax from Henry to BEW (A/CP)
 - 1/21/99 four-page fax from Halpern to BEW (A/CP)

- 12/31/98 six-page fax Henry to BEW (A/CP)
- 10/28/98 five-page fax Henry to BEW (A/CP)
- 10/22/98 pages 11 37 of 37-page fax from Gardere Wynn compromising Defendant's Objections to Plaintiff's First Set of Interrogatories and Request for Production (A/CP)
- Correspondence Lieberdorfer, et al. v. IHI Texas
 - 7/7/98 DL to Lawton and MV cc BEW (A/CP)
 - 1/28/99 BEW to SVE, LS and CS (A/CP)
 - 10/27/98 17-page fax from Halpern to SVE (A/CP)
 - 10/28/98 five-page fax from Rhonda Peditto to BEW (A/CP)
 - 10/26/97 36-page fax from Henry to BEW (A/CP)
 - 10/23/98 20-page fax Halpern to BEW (A/CP)
 - 10/27/98 three-page fax Halpern to BEW (A/CP)
 - 11/5/98 three-page fax Halpern to BEW (A/CP)
 - 11/5/98 three-page fax Halpern to BEW (A/CP)
 - 10/29/98 five-page fax Halpern to BEW (A/CP)
 - 10/22/98 facsimile correspondence from Halpern to BEW, Lawton and GMM (A/CP)
 - 5/15/98 GMM to Lawton with enclosure (A/CP)
 - 10/19/98 eight-page fax Halpern to BEW (A/CP)
 - 10/23/98 30-page fax Henry to BEW (A/CP)
 - 10/19/98 GMM to Halpern with enclosures (A/CP)
 - 10/19/98 three-page fax Halpern to BEW (A/CP)
 - 10/20/98 five-page fax Halpern to BEW (A/CP)
 - 10/16/98 six-page fax Halpern to BEW (A/CP)
 - 10/14/98 four-page fax Halpern to BEW (A/CP)
 - 10/13/98 four-page fax Halpern to BEW (A/CP)
 - 7/22/98 16-page fax Lawton to GMM (A/CP)
 - 9/22/98 15-page fax Henry to BEW (A/CP)
 - 7/2/98 13-page fax Henry to BEW (A/CP)
 - 7/1/98 fax Halpern to BEW (A/CP)
 - 5/21/98 14-page fax Sonde to BEW (A/CP)
 - 5/7/98 21-page fax Henry to BEW (A/CP)
 - 5/5/98 eight-page fax Halpern to BEW (A/CP)
 - 5/12/98 eight-page fax MV to Halpern and Henry (A/CP)
 - 4/29/98 correspondence Lang to BEW with enclosure (A/CP)
 - 5/18/98 two-page fax MV to DH (A/CP)
 - 5/18/98 two-page fax MV to Henry (A/CP)
 - 5/9/98 three-page fax Kim Barry to BEW (A/CP)
 - 5/9/98 three-page fax Kim Barry, IHI employee to BEW (A/CP)
 - 5/6/98 BEW to Lawton (A/CP)
 - 4/27/98 14-page fax Sond to BEW (A/CP)
 - 4/20/98 three-page fax Lang to BEW (A/CP)
 - 5/7/98 correspondence Henry to BEW and Sond (A/CP)
 - 5/15/98 three-page fax MV to BEW (A/CP)
 - 4/23/98 three-page fax Lang to BEW (A/CP)
 - 4/14/98 Wood & Francis internal document (WP)
 - 4/7/98 GMM to BEW (A/CP)

- Miscellaneous Documents
 - 7/29/98 58-page fax Lang to BEW (A/CP)
- Attorney Notes Liebendorfer, et al. IHI Texas
 - 7/13/98 handwritten notes BEW (WP)
 - 5/8/98 handwritten notes BEW (WP)
 - 4/17/98 handwritten notes BEW (WP)
 - 4/13/98 handwritten notes BEW (WP)
 - 4/17/98 handwritten notes BEW (WP)
- Discovery Liebendorfer, et al. v. IHI Texas
 - 10/26/98 correspondence Halpern to Keith M. Jensen, Esq. with enclosures (A/CP)
 - 10/27/98 Henry to BEW with enclosure (A/CP)

- · Josephson Attorney-Client Privilege
 - 9/22/98 IHI memo from GMM to AEF labeled Confidential Attorney Work Product regarding Jenna E. Josephson v. International Heritage, Inc. Litigation. Attached to this memo is a large body of documents from GMM (WP)(A/CP)
- NC Sales Tax Temp File
 - 12/16/98 two-page fax Charles H. Mercer to BEW (A/CP)
 - 12/3/98 three-page fax Mercer to BEW (A/CP)
 - 12/8/98 three-page fax Mercer to BEW (A/CP)
 - 12/14/98 two-page fax Mercer to BEW (A/CP)
 - 10/2/98 fax BEW to Mercer (A/CP)
 - 10/2/98 nine-page fax BEW to GMM (A/CP)
 - 10/1/98 correspondence Mercer to BEW (A/CP)
 - 9/29/98 BEW to Mercer (A/CP)
 - 9/14/98 two-page fax BEW to GMM (A/CP)
 - 10/9/98 postmarked envelope containing 10/9/98 GMM to Mercer with enclosures cc Joe McLeod, Rob Hukezalie and BEW - all three without enclosures (A/CP)
- Gilbert v. IHI Correspondence
 - 6/1/99 BEW to SVE (A/CP)
 - 3/23/99 Peditto to Anna and Chante Mayflower Capital (A/CP)
 - 3/18/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
 - 2/8/99 BEW to SVE (A/CP)
 - 12/8/99 Peditto copy email transmission Peditto to BEW (A/CP)
 - 11/2/98 three-page fax Lawton to BEW (A/CP)

- 11/3/98 two-page fax Sond to BEW (A/CP)
- 9/29/98 19-page fax BEW to Lawton (A/CP)
- 9/18/98 13-page fax Lawton to BEW (A/CP)
- 9/17/98 14-page fax Lawton to BEW (A/CP)
- 9/10/98 eight-page fax Lawton to BEW (A/CP)
- 9/10/98 eight-page fax Lawton to BEW (A/CP)
- 8/4/98 six-page fax GMM to BEW and MV (A/CP)
- 9/28/98 seven-page fax Pamela Williams to BEW (A/CP)
- 9/28/98 eight-page fax Williams to BEW (A/CP)
- 9/25/98 eight-page fax Williams to BEW (A/CP)
- 9/25/98 two-page fax Williams to BEW (A/CP)
- 9/22/98 two-page fax Williams to BEW (A/CP)
- 9/22/98 four-page fax Williams to BEW (A/CP)
- 9/18/98 13-page fax Williams to BEW (A/CP)
- 8/5/98 four-page fax Chris Willis to BEW (A/CP)
- 7/22/98 16-page fax DL to BEW and Lawton (A/CP)
- 7/7/98 GMM to BEW (A/CP)
- 9/29/98 fax BEW to DL (A/CP)
- 9/29/98 " (A/CP)
- 9/29/98 19-page fax BEW to DL (A/CP)
- 10/1/98 eight-page fax Williams to BEW (A/CP)
- 10/28/98 30-page fax Williams to BEW (A/CP)
- 9/29/98 seven-page fax Williams to BEW (A/CP)
- 10/1/98 11-page fax Williams to BEW (A/CP)
- 10/2/98 three-page fax Chris Willis to BEW (A/CP)
- 10/2/98 three-page fax Chris Willis to BEW (A/CP)
- 10/28/98 five-page fax Pamela Smith to BEW (A/CP)
- NC Sales Tax Temp File (Second Heading)
 - 11/24/98 BEW to Mercer with enclosure (A/CP)
- Attorney Notes
 - 3/4/99 Memo from AEF to BEW with attachment (A/CP)
 - 12/10/98 Peditto copy of email transmission from Peditto to BEW with yellow Post-It Note attached (A/CP)
 - Miscellaneous Notes BEW (WP)
- International Heritage, Inc. Donald Butler Attorney Notes
 - 9/28/98 handwritten notes BEW (WP)
- International Heritage, Inc. Donald Butler Correspondence
- 10/8/98 GMM to BEW with attachment (A/CP)
- 9/29/98 seven-page fax BEW to GMM (A/CP)
- 9/29/98 seven-page fax BEW to CR (A/CP)

- 9/28/98 facsimile correspondence BEW to GMM (A/CP)
- 9/10/98 GMM to BEW (A/CP)
- 9/9/98 two-page fax Halstead to BEW (A/CP)
- 9/3/98 correspondence GMM to MV with attachment (A/CP)
- 9/9/98 note from MV to BEW attached (A/CP)
- 9/8/98 three-page fax BEW to Lawton (A/CP)
- 9/4/98 eight-page fax GMM to MV (A/CP)
- 8/24/98 Lawton to GMM (A/CP)
- · Miscellaneous Documents
 - 8/20/98 seven-page fax CR to BEW (A/CP)
 - 9/2/98 17-page fax BEW to GMM (A/CP)
- International Heritage, Inc. Joanna Bise Attorney Notes
 - 9/29/98 Memo AEF to BEW (WP)(A/CP)
- International Heritage, Inc. Joanna Bise Correspondence
 - 9/22/98 GMM to BEW (A/CP)
 - 9/15/98 DL to BEW (A/CP)
 - 9/29/98 BEW to DL with enclosure (A/CP)
 - 9/29/98 seven-page fax BEW to DL (A/CP)
 - 9/22/98 three-page fax GMM to BEW (A/CP)
- International Heritage, Inc. Joanna Bise Client Documents
 - Undated two-page rep list marked Attorney-Client Privileged (WP)(A/CP)
- Gilliam, John (Virginia Matter) IHI
 - 7/28 handwritten notes on inside of folder from AEF (WP)
 - Copies of North Carolina General Statutes (WP)
 - 8/31/98 two-page fax Tim Otto to AEF (A/CP)
 - 9/1/98 five-page fax AW to BEW (A/CP)
 - · Undated draft of Objection to Default with handwritten notes BEW (WP)
 - 8/20/98 seven-page fax Viola Speller to Elaine Tarkington (A/CP)
 - 8/17/98 four-page fax Tim Otto to AEF (A/CP)
 - 9/24/98 four-page fax GMM to AEF (A/CP)
- Thorn, Paul and Andrea
 - 11/18/98 fax from Peditto to Peter Scanlon (A/CP)
 - Undated Interoffice Memorandum from SVE to GMM and CR, CC, JB, Jeff Hooks, Ken Rudd, Gary Racer, BEW (A/CP)
 - Undated Interoffice Memorandum from SVE to GMM and CR, CC, JB, Jeff Hooks, Ken Rudd, Gary Racer, BEW (A/CP)

- Undated Interoffice Memo from CR and Peter Scanlon to SVE, CC, GMM, JB, Ken Rudd, Gary Racer, BEW (A/CP)
- Undated Interoffice Memo from CR and Peter Scanlon to SVE, CC, GMM, JB, Ken Rudd, Gary Racer, BEW (A/CP)
- Gina Josephson Correspondence
 - 4/18/98 correspondence GMM to AS with enclosures (A/CP)
 - 5/28/97 three-page fax GMM to JB with handwritten notes of GMM attached (A/CP)
 - 9/8/98 five-page fax AEF to GMM (A/CP)
 - 9/8/98 facsimile communication AEF to GMM (A/CP)
 - 2/13/96 GMM to DA (A/CP)
 - 3/21/96 FDB to SVE (A/CP)
 - 3/22/96 12-page fax GMM to SVE (A/CP)
 - Undated Handwritten Notes AEF (WP)
 - Various copies of North Carolina Court Opinions (WP)

- Miscellaneous Documents
 - 12/31/98 six-page fax Henry to BEW (A/CP)
- Client Documents Marsh, et al. v. IHI Texas
 - Undated Plaintiff Information Sheet Denise Marsh with upline and application attached (WP)
 - 5/7/98 four-page fax DH to BEW (A/CP)
 - 5/8/98 five-page fax DH to BEW (A/CP)
 - 5/7/98 four-page fax DH to BEW (A/CP)
 - 5/8/98 five-page fax DH to BEW (A/CP)
 - 5/10/98 nine-page fax Angie Chiavone to BEW (A/CP)
- Research Marsh, et al. v. IHI Texas
 - Northern District Texas Court Opinion (WP)
- Attorney Notes Marsh, et al. v. IHI Texas
 - 1/14/99 handwritten notes BEW (WP)
 - 1/13/99 transcript of voice mail from Russ E. Tucker to BEW with handwritten notes BEW (WP)
 - 7/27/98 correspondence GMM to BEW with attachment (A/CP)
 - 7/27/98 handwritten notes BEW (WP)
 - 7/16/98 handwritten notes BEW (WP)
 - 7/16/98 handwritten notes BEW (WP)
 - 7/20/98 handwritten notes BEW (WP)
 - 7/20/98 handwritten notes BEW (WP)

- 7/21/98 handwritten notes BEW (WP)
- 7/14/98 handwritten notes BEW (WP)
- 7/29/98 handwritten notes BEW (WP)
- 6/18/98 handwritten notes BEW (A/CP)
- 6/19/98 seven-page fax from Dctrid, Price & Rhodes with handwritten notes (A/CP)
- Undated draft Defendant's Answer to Plaintiff's First Amended Petition in Marsh, et al.
 v. IHI, et al. (WP)

Marsh

- Undated draft Defendant's Memorandum in Opposition with handwritten attorney notes (WP)
- 7/24/98 32-page facsimile Henry to BEW (A/CP)
- 8/11/98 two-page fax BEW to Lawton (A/CP)
- 8/11/98 correspondence BEW to Lawton and Halpern (A/CP)
- 8/11/98 two-page fax BEW to Halpern (A/CP)
- 8/7/98 correspondence BEW to Catherine Botticelli, Esq. (A/CP)
- 8/6/98 correspondence BEW to Rob Hukezalie (A/CP)
- 8/6/98 facsimile BEW to Halpern (A/CP)
- 7/29/98 two-page fax BEW to MV (A/CP)
- 7/29/98 two-page fax BEW to Halpern (A/CP)
- 7/27/98 correspondence GMM to BEW with handwritten notes Attorney-Client Privileged with enclosures (A/CP)
- 7/27/98 five-page fax MV to BEW (A/CP)
- 7/22/98 15-page fax Halpern to BEW (A/CP)
- 7/17/98 correspondence GMM to MV and BEW (A/CP)

Miscellaneous Documents

- 8/19/98 22-page fax Botticelli to BEW (A/CP)
- 8/31/98 10-page fax Halpern to BEW (A/CP)
- 8/13/98 12-page fax Halpern to BEW (A/CP)
- 9/10/98 5-page fax Henry to BEW (A/CP)
- 8/10/98 correspondence to Halpern and Boticelli and BEW with enclosures (A/CP)

Correspondence - Marsh, et al. v. IHI - Texas

- 6/22/98 eight-page fax Henry to BEW (A/CP)
- 6/15/98 fax Halpern to BEW (A/CP)
- 5/11/98 21-page fax GMM to BEW (A/CP)
- 5/20/98 correspondence BEW to Henry with enclosures (A/CP)
- 5/20/98 BEW to Henry with enclosures (A/CP)
- 5/14/98 three-page fax Henry to BEW (A/CP)
- 5/14/98 two-page fax Henry to BEW (A/CP)
- 5/11/98 GMM to BEW with enclosures (A/CP)
- 5/10/98 nine-page fax Angie Chiavone to BEW (A/CP)
- 5/1/98 facsimile BEW to GMM (A/CP)
- 8/24/98 four-page fax Henry to BEW (A/CP)

- 4/24/98 three-page fax Henry to BEW (A/CP)
- 4/15/98 113-page fax BEW to Kevin Muck, Esq. (A/CP)
- 4/14/98 Internal Wood & Francis document (WP)
- Correspondence Marsh, et al. v. IHI Texas II
 - 7/20/98 four-page fax Halpern to BEW (A/CP)
 - 7/20/98 nine-page fax Halpern to BEW (A/CP)
 - 7/17/98 correspondence MV to BEW with enclosures (A/CP)
 - 7/16/98 two-page fax Botticelli to BEW (A/CP)
 - 7/9/98 three-page fax Lang to BEW (A/CP)
 - 7/8/98 13-page fax Halpern to BEW (A/CP)
 - 7/8/98 12-page fax Halpern to BEW (A/CP)
 - 7/7/98 17-page fax Lawton to BEW (A/CP)
 - 7/7/98 three-page fax Halpern to BEW (A/CP)
 - 7/2/98 11-page fax Henry to BEW only three pages of this fax are here (A/CP)
 - 6/30/98 correspondence Halpern to Lawton, Botticelli and BEW (A/CP)
 - 6/15/98 five-page fax Halpern to BEW (A/CP)
 - 6/16/98 20-page fax Henry to BEW (A/CP)
 - 7/2/98 fax BEW to GMM cc MV, Brothers and Halpern (A/CP)
 - 7/2/98 20-page fax BEW to Halpern (A/CP)
 - 7/1/98 20-page fax BEW to GMM (A/CP)
 - 6/29/98 11-page fax Halpern to BEW (A/CP)
 - 6/25/98 22-page fax Halpern to BEW only three pages of this are present (A/CP)
 - 6/23/98 three-page fax Halpern to BEW (A/CP)
 - 6/23/98 six-page fax Henry to BEW (A/CP)
 - 6/22/98 15-page fax Halpern to BEW (A/CP)
- Correspondence Marsh, et al. v. IHI Texas
 - 7/24/98 40-page fax Halpern to BEW (A/CP)
 - 7/24/98 41-page fax Halpern to BEW c/o RB with handwritten notes BEW (A/CP)
 - 7/24/98 41-page fax Halpern to BEW c/o RB (A/CP)
 - 7/23/98 fax BEW to Halpner cc MV, Brothers, Reid and Lawton (A/CP)
 - 7/23/98 six-page fax Henry to BEW (A/CP)
 - 7/23/98 10-page fax Halpern to BEW only three pages exist (A/CP)
 - 7/22/98 17-page fax Halpern to BEW handwritten notes BEW (A/CP)
 - 7/22/98 13-page fax Halpern to BEW handwritten notes BEW (A/CP)
 - 7/22/98 five-page fax BEW to Halpern (A/CP)
 - 7/22/98 correspondence GMM to Halpern (A/CP)
 - 7/21/98 six-page fax BEW to Halpern (A/CP)
 - 7/21/98 fax BEW to Halpern (A/CP)
 - 7/21/98 five-page fax BEW to MV (A/CP)
 - 6/12/97 GMM to DH (A/CP)

Denise Marsh Deposition Transcript

- 7/21/98 correspondence Halpern to Lawton with enclosure (A/CP)
- Miscellaneous Document
 - 8/28/98 deposition summary AEF to BEW (WP)
- Deposition Outlines
 - Undated deposition outline Tucker (WP)
 - 7/14/98 Deposition outline Marsh (WP)
- Correspondence IV
 - 8/28/98 nine-page fax Halpern to BEW (A/CP)
 - 8/28/98 nine-page fax Henry to BEW (A/CP)
 - 8/26/98 five-page fax Halpern to BEW (A/CP)
 - 8/21/98 45-page fax Halpern to BEW (A/CP)
 - 8/21/98 five-page fax Halpern to BEW (A/CP)
 - 8/21/98 50-page fax Halpern to BEW (A/CP)
 - 8/20/98 BEW to CR and JB (A/CP)
 - 8/13/98 three-page fax Halpern to BEW (A/CP)
 - 8/12/98 11-page fax Botticelli to BEW (A/CP)
 - 8/11/98 seven-page fax Botticelli to BEW (A/CP)
 - 8/11/98 two-page fax Halpern to BEW (A/CP)
 - 7/22/98 four-page fax Halpern to BEW (A/CP)
 - 8/6/98 13-page fax BEW to Halpern (A/CP)
 - 8/6/98 13-page fax BEW to MV (A/CP)
 - 7/29/98 four-page fax Henry to BEW (A/CP)
 - 7/28/98 BEW to GMM with enclosure (A/CP)
 - 7/27/98 IHI memo Kevin Jones to GMM cc Robin Land Marked Attorney-Client Privileged (A/CP)
 - 7/27/98 five-page fax Henry to BEW (A/CP)
 - 7/27/98 Henry to Lawton, MV and BEW (A/CP)
 - 7/24/98 44-page fax MV to BEW (A/CP)

Correspondence V

- 9/29/98 facsimile correspondence BEW to Halpern (A/CP)
- 9/29/98 three-page fax BEW to Halpern (A/CP)
- 9/29/98 BEW to Lawton (A/CP)
- 9/28/98 five-page fax Halpern to BEW (A/CP)
- 9/28/98 five-page fax Halpern to BEW (A/CP)
- 9/23/98 seven-page fax Henry to BEW (A/CP)
- 9/23/98 three-page fax Henry to BEW (A/CP)
- 9/22/98 13-page fax Henry to BEW (A/CP)
- 9/21/98 19-page fax Henry to BEW (A/CP)
- 9/18/98 Halpern to Lawton and BEW with enclosure (A/CP)

- 9/16/98 27-page fax Halpern to BEW (A/CP)
- 9/16/98 two pages of a 27-page fax Halpern to BEW (A/CP)
- 9/16/98 34-page fax Halpern to BEW (A/CP)
- 9/15/98 31-page fax Halpern to BEW (A/CP)
- 8/28/98 four-page fax Henry to BEW (A/CP)
- 9/29/98 three-page fax BEW to DL (A/CP)
- 9/16/98 correspondence BEW to GMM cc JB and SVE (A/CP)
- 8/11/98 five-page fax Lawton to BEW (A/CP)

Correspondence VI

- 6/1/99 Halpern to BEW (A/CP)
- 1/15/99 BEW to SVE, CS and LS with enclosure (A/CP)
- 1/15/99 facsimile BEW to Halpern (A/CP)
- 1/14/99 correspondence BEW to SVE (A/CP)
- 1/14/99 correspondence BEW to Halpern with enclosures cc SVE (A/CP)
- 1/13/99 four-page fax Halpern to BEW (A/CP)
- 12/31/98 six-page fax Henry to BEW (A/CP)
- 10/29/98 two-page fax Halpern to BEW (A/CP)
- 11/2/98 three-page fax Halpern to BEW (A/CP)
- 5/15/98 GMM to Lawton with enclosure (A/CP)
- 10/22/98 six-page fax BEW to Halpern (A/CP)
- 10/22/98 six-page fax BEW to Lawton (A/CP)
- 10/22/98 seven-page fax Halpern to BEW (A/CP)
- 10/19/98 29-page fax Henry to BEW (A/CP)
- 10/19/98 19-page fax Lawton to Halpern cc BEW (A/CP)
- 10/18/98 four-page fax Halpern to BEW (A/CP)
- 10/16/98 two-page fax Lawton to BEW (A/CP)
- 10/15/98 eight-page fax Halpern to BEW (A/CP)
- 10/7/98 correspondence James Russell Tucker to 101st Judicial District Court of Halpern, BEW and Bernie Hauder (A/CP)
- 10/2/98 Halpern to BEW (A/CP)
- 10/2/98 three-page fax Halpern to BEW (A/CP)

Box 96W342I 115

- GMM Draft Responses to Discovery
 - 7/17/98 correspondence GMM to MV and BEW entitled Attorney Work Product with enclosures (WP)(A/CP)
- Research Meckenstock, et al. v. IHI NC Fed.
 - One U.C. Code Service reference (WP)
 - One court decision Eastern District of Virginia (WP)
 - One reference to the Federal Rules of Appellate Procedure (WP)
 - Various other references to U.S. Statutes and Rules of Procedure (WP)

- Copy of Plaintiffs' Memorandum of Law in Opposition to Defendant's Objection to Magistrate's Memorandum and Recommendation (WP)
- One U.S. Code reference with handwritten notes (WP)
- One U.S. Rules reference with handwritten notes (WP)

Attorney Notes

- 6/14/99 handwritten notes BEW (WP)
- 6/9/99 handwritten notes BEW (WP)
- 5/20/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 5/25/99 Peditto copy of email transmission from BEW to Peditto (A/CP)
- 5/28/99 handwritten notes BEW (WP)
- Miscellaneous notes BEW (WP)
- Undated draft Defendant's Report of Parties' Planning Meeting with edits and handwritten notations (WP)
- 12/21/98 Gene Davis copy of email transmission from BEW to Gene Davis cc Rhonda Peditto (A/CP)
- 1/27/99 transcript of voice mail message from BEW to Gene Davis with handwritten notes (A/CP)
- 1/27/99 handwritten notes Gene Davis (WP)
- 2/1/99 handwritten notes Gene Davis (WP)
- Miscellaneous notes Gene Davis (WP)
- 2/17/98 handwritten note BEW attached to draft Defendant's Reply to Plaintiffs' Memorandum of Law (WP)
- Miscellaneous handwritten notes (WP)
- 7/21/98 handwritten notes BEW (WP)
- 6/22/98 handwritten notes BEW (WP)
- 6/1/98 handwritten notes BEW (WP)
- 6/2/98 handwritten notes BEW (WP)
- Correspondence I Meckenstock, et al. v. IHI NC Fed
 - 8/14/98 Lawton to BEW (W/CP)
 - 6/10/98 GMM to Lawton (A/CP)
 - 6/3/98 nine-page fax Lawton to BEW (A/CP)
 - 6/3/98 10-page fax BEW to Lawton (A/CP)
 - 6/3/98 GMM to Lawton cc CR and BEW (A/CP)
 - 6/2/98 18-page fax Henry to BEW (A/CP)
 - 6/2/98 two-page fax Lawton to BEW (A/CP)
 - 6/2/98 six-page fax Lawton to BEW (A/CP)
 - 6/2/98 six-page fax Lawton to BEW (A/CP)
 - 6/2/98 two-page fax Lawton to BEW (A/CP)
 - 6/1/98 seven-page fax BEW to Lawton (A/CP)
 - 6/1/98 six-page fax Lawton to BEW (A/CP)
 - 5/28/98 six-page fax BEW to Lawton and MV (A/CP)
 - 5/28/98 correspondence BEW to Lawton and MV with enclosures (A/CP)
 - 5/18/98 BEW to Lawton (A/CP)
 - 5/11/98 BEW to Botticelli (A/CP)

- 4/27/98 13-page fax BEW to Sond (A/CP)
- 4/24/98 10-page fax Dennis J. Lawson to BEW (A/CP)
- 4/14/98 Wood & Francis internal document (WP)
- Correspondence II Meckenstock, et al. v. IHI NC Fed
 - 4/27/98 facsimile correspondence BEW to Sond cc JB, SVE, CS and LS (A/CP)
 - 5/28/98 correspondence from GMM to Douglas S. Lang, Esq. cc JB and BEW (A/CP)
- Correspondence Meckenstock, et al. v. IHI NC Fed
 - 8/3/99 correspondence BEW to SVE (A/CP)
 - 8/3/99 correspondence BEW to CS (A/CP)
 - 6/18/99 BEW to SVE (A/CP)
 - 6/18/99 BEW to CS (A/CP)
 - 6/7/99 BEW to SVE (A/CP)
 - 5/28/99 BEW to SVE (A/CP)
 - 5/28/99 BEW to CS (A/CP)
 - 5/24/99 BEW to CS (A/CP)
 - 5/24/99 BEW to SVE (A/CP)
 - 2/5/99 BEW to CS (A/CP)
 - 2/5/99 BEW to SVE (A/CP)
 - 2/5/99 BEW to LS (A/CP)
 - 1/27/99 BEW to SVE, LS and CS (A/CP)
 - 1/11/99 BEW to SVE, LS and CS (A/CP)
 - 12/18/98 BEW to SVE, LS and CS (A/CP)
 - 5/15/98 GMM to Betina M. Lawton (A/CP)
 - 10/22/98 BEW to Lawton (A/CP)
 - 10/15/98 BEW to Lawton with enclosure (A/CP)
 - 6/19/98 BEW to Lawton (A/CP)
 - 6/19/98 eight-page fax BEW to Botticelli (A/CP)
 - 6/19/98 eight-page fax BEW to Halpern (A/CP)
 - 6/19/98 correspondence BEW to GMM with enclosure (A/CP)
 - 6/19/98 eight-page fax BEW to Botticelli (A/CP)
 - 6/19/98 two-page fax Halpern to BEW (A/CP)
 - 6/19/98 eight-page fax BEW to Halpern (A/CP)
 - 6/19/98 correspondence BEW to Halpern with enclosure (A/CP)
 - 6/19/98 four-page fax Halpern to BEW (A/CP)
 - 6/18/98 three-page fax Halpern to BEW (A/CP)
 - 6/18/98 nine-page fax Halpern to BEW (A/CP)
 - 6/16/98 eight-page fax Henry to BEW (A/CP)
 - 6/18/98 correspondence MV to BEW (A/CP)
 - 6/15/98 16-page fax Halpern to BEW (A/CP)
 - 6/12/98 four-page fax Halpern to BEW (A/CP)
 - 6/12/98 four-page fax Halpern to BEW (A/CP)
 - 6/12/98 facsimile Halpern to BEW (A/CP)
 - 6/12/98 two-page fax Halpern to BEW with handwritten notes BEW (A/CP)
 - 6/11/98 46-page fax Lawton to BEW (A/CP)

- 6/10/98 10-page fax BEW to Lawton (A/CP)
- Rusty Tucker
 - 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
 - 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
 - 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
 - Undate five copies of Mississippi Supreme Court action regarding the disbarment of James Russell Tucker (WP)
 - 7/10/98 Halpern to MV with enclosure cc Lang (A/CP)
 - Undated miscellaneous handwritten notes (WP)
- Miscellaneous Documents
 - 7/29/98 facsimile correspondence BEW to RB (A/CP)
- Keith Yarborough
 - Undated memorandum Julie Bell to BEW (A/CP)
 - 3/18/97 eight-page facsimile transmission JB to BEW (A/CP)
 - Undated anonymous letter to SVE with handwritten notes on it (WP)
 - Miscellaneous handwritten notes BEW (WP)
- Yarborough
 - Undated handwritten notes AEF (WP)
 - Background check Yarborough (WP)
 - Undated AEF compilation of information regarding Keith Yarborough (WP)
 - 7/30/98 property summary of Gerald Mansur (WP)
 - 7/29/98 facsimile transmission GMM to AEF and BEW (A/CP)
 - Undated AEF list of scheduled depositions (WP)
 - 7/31/98 correspondence GMM to BEW marked Confidential Attorney Work Product with enclosures cc CR and RB (A/CP)
 - 7/30/98 four-page fax AEF to Grodi of Documents Resources/Texas (note only the fax cover page available here) (WP)
 - 7/29/98 four-page fax AEF to Henry (A/CP)
 - 7/30/98 three-page fax Henry to AEF (A/CP)
 - 7/29/98 facsimile BEW to SVE and JB cc GMM and AEF (A/CP)
 - 8/3/98 fax cover page for three-page fax AEF to Allison Blackman (A/CP)
- Dr. King Affidavit
 - 6/11/98 handwritten note to BEW from Andrea of IHI with printed internote postings attached (A/CP)
 - 6/16/98 23-page fax MV to BEW (A/CP)
 - 10/2/98 BEW to Lawton with enclosures (A/CP)
 - 8/24/98 BEW to MV cc JB and GMM with enclosures (A/CP)
 - 8/14/98 two-pages of a 42-page fax BEW to Lawton and Botticelli (A/CP)

- 7/28/98 BEW to Lawton with enclosures (A/CP)
- 7/27/98 facsimile BEW to Lawton cc GMM and JB (A/CP)
- 7/27/98 11-page fax BEW to Lawton (A/CP)
- 6/10/98 GMM to Lawton with enclosures cc BEW and AS (A/CP)
- 7/11/98 Memo Lawton to Sond, Botticelli, MV and Dennis Lawson cc BEW (A/CP)
- 7/6/98 BEW to Lawton with enclosures (A/CP)
- 7/1/98 three-page fax BEW to Lawton (A/CP)
- Undated Priority Mail package from IHI to Wood & Francis bearing handwritten notes of BEW containing numerous web printouts regarding Meckenstock litigation (WP)

- Nemelka, David (Loan to Van Etten/IHI) IHI General
 - 5/26/99 nine-page fax Peditto/BEW to Anna Taylor, Mayflower Capital (A/CP)
 - 4/1/99 facsimile BEW to David Namelka (A/CP)
- Market America Research IHI General
 - Undated eight-page MLM Insider Magazine article (WP)
 - Undated 38-page law library article by Spencer M. Reese (WP)
 - Undated web article regarding MLMs (WP)
 - 7/28/99 Forbes article (WP)
 - 6/22/99 16-page news article from Montana State Auditor's Office (WP)
- Attorney Notes
 - Undated draft Response to Plaintiff's Motion to Compel Market America v. Ray Rossi (WP)
 - Draft IHI Response and Memorandum in Opposition to Plaintiff's Motion to Compel-Market American vs. Ray Rossi (WP)
- Research
 - 1/6/97 U.S. Code Research (WP)
- Market America v. Rossi
 - Miscellaneous handwritten note from BEW to AEF (WP)
 - 4/20/98 handwritten note Elaine Tarkington to CTF (WP)
 - 3/16/98 CR to BEW (A/CP)
- Internet Thread on Pumping and Dumping Stock in Meckenstock
 - 6/3/99 print-out of downloaded material from the internet regarding pumping and dumping stocks (WP)

- Meckenstock v. IHI (Internet Postings By and To D. Meckenstock) Research Internet IHI
 #1
 - 6/3/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/28/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/19/99 several hundred pages of printed internet postings regarding IHI from Silicon Investors website (WP)
- Meckenstock v. IIII (Internet Postings By and To D. Meckenstock) Research Internet -BAAT #2
 - 6/3/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/28/99 BEW copy of internet transmission from AEF to BEW (WP)(A/CP)
 - 5/25/99 approximately 100-200 pages of posted internet transmissions regarding BAAT Electric Vehicles to Silicon investors (WP)
 - 5/26/99 several hundred pages of email transmissions regarding BAAT Electronic Vehicles to Silicon investors' website (WP)
- Meckenstock v. IHI (Internet Postings By and To D. Meckenstock) Research Internet -BAAT #1
 - 6/3/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/28/99 BEW copy of email transmission from AEF to BEW (WP)(A/CP)
 - 5/20/99 approximately several hundred pages of printed email transmissions regarding BAAT Electric Vehicles Posted to Silicon Investors' website (WP)
 - 5/21/99 several hundred pages of email transmissions regarding BAAT Electric Cars to Silicon Investors' website (WP)

- IHI General Correspondence 1
 - 10/21/96 BEW to SVE (A/CP)
 - 10/16/96 BEW to SVE (A/CP)
 - 7/15/96 four-page fax BEW to SVE marked Personal and Confidential (A/CP)
 - 6/18/96 three-page fax BEW to SVE only 2 pages of this fax available (A/CP)
 - 5/15/96 correspondence BEW to SVE with enclosures (A/CP)
 - 5/14/96 BEW to SVE with enclosures (A/CP)
 - 4/24/96 BEW to SVE with enclosures (A/CP)
 - 4/15/96 four-page fax SVE to BEW (A/CP)
 - 4/18/96 facsimile BEW to SVE (A/CP)
 - 4/17/96 BEW to SVE with enclosures (A/CP)
 - 4/12/96 BEW to SVE with enclosure (A/CP)
 - 4/15/96 two-page fax Hywel Leonard, Esq. to BEW cc SVE re Jerry L. Brooks v. SVE, Wake County 95 CVS 978 and 979 (A/CP)
 - 3/27/96 BEW to SVE with enclosures (A/CP)
 - 3/12/96 SVE to BEW with enclosure (A/CP)
 - 2/19/96 BEW to SVE with enclosure (A/CP)

- 2/8/96 BEW to SVE with enclosures (A/CP)
- 11/9/95 16-page fax GMM to BEW with handwritten notes BEW (A/CP)
- 1/4/96 BEW to SVE (A/CP)
- 1/8/96 BEW to SVE with enclosure (A/CP)
- 12/18/95 BEW to SVE (A/CP)
- 11/16/95 BEW to SVE (A/CP)
- 11/13/95 BEW to SVE with enclosures (A/CP)
- 10/30/95 BEW to SVE with enclosures (A/CP)
- 10/26/95 GMM to CS, LS, SVE and BEW (A/CP)
- 10/26/95 IHI Board of Directors Meeting Agenda (A/CP)
- 7/11/95 five-page fax BEW to SVE (A/CP)
- 7/27/95 draft letter from SVE to Board of Directors (WP)
- 6/26/95 eight-page fax BEW to SVE (A/CP)

IHI - General Correspondence 2

- 11/13/97 10-page fax from Victor Palmer, IHI to Wood & Francis (A/CP)
- 5/30/97 copy of certified letter to Sherry Lee with yellow Post-It of notes from Elaine Tarkington attached (A/CP)
- 12/12/97 BEW to CR with enclosure (A/CP)
- 12/4/97 three-page fax BEW to CR and GMM (A/CP)
- Miscellaneous handwritten notes BEW (WP)
- 12/18/97 handwritten notes BEW (WP)
- 12/10/97 two-page fax CR to BEW (A/CP)
- 12/8/97 CR to JAB (A/CP)
- 12/4/97 fax BEW to CR with enclosure (A/CP)
- 11/11/97 memo from AW to BEW with handwritten note BEW (A/CP)
- 11/4/97 JAB to John S. Smith, Bureau of Consumer Protection, Georgia cc SVE, CR and FDB (A/CP)
- 11/24/97 three-page fax CR to JAB (A/CP)
- 8/4/97 BEW to JB cc SVE, CTF, GMM, CR and Keith Mackey (A/CP)
- 12/10/96 six-page fax AW to Elaine Tarkington (A/CP)
- 9/25/97 invoice James S. Holiday to IHI c/o GMM (A/CP)
- 11/19/97 CR to BEW with enclosure (A/CP)
- 11/19/97 GMM to James S. Holiday cc BEW, JB, Jeff Trendel and CR (A/CP)
- 11/13/97 four-page fax CR to BEW (A/CP)
- 11/13/97 FDB to JAB (A/CP)
- 11/10/97 BEW to SVE cc JB and CR (A/CP)
- 11/10/97 fax BEW to FDB cc SVE, JB and CR (A/CP)
- 11/7/97 handwritten note AW to BEW (WP)
- 9/15/97 copy of handwritten note on IHI letterhead to SVE and Staff (A/CP)
- 11/7/97 two-page fax BEW to CR (A/CP)
- 11/5/97 five-page fax BEW to GMM with handwritten notes (A/CP)
- 11/4/97 seven-page fax GMM to BEW (A/CP)
- 11/4/97 BEW to GMM with enclosure (A/CP)
- 10/31/97 22-page fax BEW to GMM (A/CP)
- 10/28/97 12-page fax CR to JAB (A/CP)
- 10/16/97 BEW to GMM with enclosure (A/CP)

- 10/9/97 eight-page fax CR to BEW (A/CP)
- 9/25/97 two-page fax Tim Otto, IHI to BEW (A/CP)
- 9/30/97 26-page fax CR to JAB cc SVE, JB, Derek Striker, Jeff Hooks, Peter Scanlon, BEW and FDB (A/CP)
- 9/22/97 eight-page fax CR to JAB (A/CP)
- 6/7/96 SVE to Frank R. Liggett, III (A/CP)
- IHI General Correspondence 3
 - 1/14/98 eight-page fax CR to BEW (A/CP)
 - 6/12/98 six-page fax AS to BEW (A/CP)
 - 6/15/98 IHI Board of Directors Meeting Agenda with some handwritten notes BEW (A/CP)
 - 6/15/98 IHI Board of Directors Meeting Agenda (A/CP)
 - 4/6/98 three-page fax CR to BEW (A/CP)
 - 6/9/98 GMM to BEW cc Rob Hukezalie with enclosures (A/CP)
 - 5/6/98 BEW to Rob E. Zaytoun, Esq. cc SVE and JB (A/CP)
 - 4/3/98 seven-page fax GMM to BEW cc JB and DH (A/CP)
 - 4/3/98 GMM to BEW cc JB and DH with enclosure (A/CP)
 - 4/28/98 13-page fax from IHI consisting of revised IRSR application and Fast Start Program brochure (A/CP)
 - 4/17/98 one-page fax from Mayflower Capital re International Heritage, Inc. Draft Balance Sheet 31 March 1998 unaudited stamped Draft and Confidential (WP)
 - 8/18/97 copy of correspondence from Kari Howe to SVE with yellow Post-It note to BEW attached (A/CP)
 - 4/14/98 handwritten notes BEW (WP)
 - 4/13/98 handwritten notes BEW (WP)
 - 3/10/98 IHI memo Diane Wilson to SVE re transcription of message from FDB to SVE (A/CP)
 - 3/9/98 two-page fax R. Gene Davis to AS (A/CP)
 - 2/28/98 three-page BEW to Mark Bibbs (A/CP)
 - 2/27/98 GMM to BEW cc CR, SVE and JB (A/CP)
 - 2/25/97 CR to BEW (A/CP)
 - 2/24/98 BEW to GMM cc SVE and JB (A/CP)
 - 2/23/98 two-page fax BEW to CR (A/CP)
 - 2/18/98 four-page fax AW to BEW (A/CP)
 - Miscellaneous handwritten notes BEW (WP)
 - 2/17/98 IHI Memo GMM to all Vice Presidents review from the Office of General Counsel (A/CP)
 - 3/11/98 handwritten notes BEW (WP)
 - 2/17/98 three-page fax AW to BEW (A/CP)
 - 2/10/98 handwritten notes BEW (WP)
 - 1/30/98 three-page fax BEW to Marks Lane (A/CP)
 - 1/29/98 IHI Memo CR to Dawn McIntyre (A/CP)
 - 1/29/98 seven-page fax GMM to BEW (A/CP)
 - 1/28/98 two-page fax Marks Lane to BEW (A/CP)
 - 1/21/98 five-page fax BEW to JB (A/CP)
 - 1/21/98 five-page fax BEW to SVE (A/CP)

- 1/21/98 draft correspondence BEW to GMM (WP)
- 1/21/98 five-page fax BEW to CR (A/CP)
- 1/21/98 five-page fax BEW to Peter Scanlon (A/CP)
- 1/21/98 Memorandum BEW to SVE, JB, CR, and Peter Scanlon cc CTF re DSA Multi-Level Marketing Seminar on 1/15/98 (A/CP)
- 1/19/98 three-page fax BEW to JB (A/CP)
- 1/19/98 three-page fax BEW to SVE (A/CP)
- 1/19/98 three-page fax BEW to CR (A/CP)
- 1/16/98 faxed Martin Luther King, Jr. flyer from IHI (A/CP)
- 1/29/98 handwritten notes BEW (WP)
- 1/21/98 facsimile BEW to SVE cc JB, CR and CTF (A/CP)
- 1/16/98 News & Observer Editorial Under The Dome 5/21/97 (WP)
- 1/25/98 facsimile of letter from SVE to IHI Employees with handwritten notes (A/CP)
- 1/14/98 four-page fax BEW to Shannon Zeko (A/CP)
- 1/13/98 four-page fax BEW to CR (A/CP)
- 1/13/98 four-page fax BEW to FDB (A/CP)
- 1/14/98 faxed communication BEW to Shannon Zeko cc Peter Scanlon and CR (A/CP)
- 1/9/98 two-page fax Shannon Zeko to BEW (A/CP)
- 1/13/98 three-page fax CR to BEW (A/CP)
- 1/12/98 two-page fax CR to FDB (A/CP)
- 1/7/98 three-page fax CR to BEW (A/CP)
- IHI General Correspondence 4
 - 6/1/98 six-page fax from Marks Lane to BEW (A/CP)
 - 5/28/98 two-page fax BEW to AW (A/CP)
 - 6/26/98 two-page fax CR to BEW (A/CP)
 - 7/2/98 correspondence BEW to SVE with attachment (A/CP)
 - 5/5/98 facsimile BEW to GMM cc JB (A/CP)
 - 5/5/98 facsimile BEW to GMM cc JB with attachment (A/CP)
 - 5/5/98 three-page fax BEW to GMM (A/CP)
 - 6/8/98 two-page fax CR to BEW (A/CP)
 - Undated research Alabama Code § 8-19-5 (WP)
 - 5/15/98 12-page fax IHI to BEW (A/CP)
 - 5/26/98 handwritten notes BEW (WP)
 - 5/28/98 handwritten notes BEW (WP)
 - 6/2/98 handwritten notes BEW (WP)
 - 6/12/98 handwritten notes BEW (WP)
 - 6/18/98 handwritten notes BEW (WP)
 - 1/16/98 two-page fax CR to FDB (WP)
- IHI General Correspondence 5
 - 10/30/98 copy of correspondence from Streich Lang to SVE with handwritten note from CR to BEW (A/CP)
 - 12/23/98 five-page fax from Alan Woodlief to BEW (A/CP)
 - 10/15/98 IHI Memo GMM to Board of Directors and Executive Management (A/CP)
 - 9/23/98 three-page fax GMM to BEW (A/CP)

- 9/16/98 four-page fax GMM to BEW (A/CP)
- 7/12/98 four-page fax GMM to BEW and RB (A/CP)
- 7/12/98 four-page fax GMM to BEW (A/CP)
- 7/17/98 five-page fax Linda Halstead to BEW (A/CP)
- 7/20/98 IHI Board of Directors Meeting Agenda with handwritten notes BEW (A/CP)
- 7/17/98 four-page fax GMM to BEW (A/CP)
- 7/17/98 three-page fax Linda Halstead to BEW (A/CP)
- 8/22/98 two-page fax Wendy Rainer, IHI to BEW (A/CP)
- 8/21/98 correspondence CR to FDB (A/CP)
- 9/1/98 correspondence CR to FDB (A/CP)
- 9/8/98 two-page fax Angie Stewart to BEW (A/CP)
- 7/2/98 two-page fax BEW to JB (A/CP)
- 8/4/98 four-page fax GMM to BEW (A/CP)
- 7/13/98 10-page fax Elaine Tarkington to Sue Halpner with handwritten notes of BEW attached (A/CP)
- 12/17/97 correspondence CR to BEW (A/CP)
- 9/2/97 IHI Memo SVE to BEW with handwritten note BEW attached (A/CP)
- 9/5/97 draft letter from G. L. Smith to Christine Lanning with handwritten note to BEW
- Miscellaneous handwritten notes
- 6/19/98 three-page fax BEW to SVE, JB, Rob Hukezalie (A/CP)

New Vision

- undated miscellaneous handwritten notes of BEW (WP)
- 10/19/98 three page facsimile from Paul Greenberg to BEW and Peter Reilly (A/CP)
- 10/21/98 three pages of an eleven page facsimile from Paul Greenberg to Peter Reilly and Ed Wainscott marked confidential and protected under the client-attorney privilege and work-product doctrine (A/CP)
- 10/22/98 one page facsimile of 10/21/98 memo from Paul Greenberg to Peter Reilly and Ed Wainscott sent by Greenberg to BEW with note from Greenberg to BEW written on it (A/CP)
- 10/20/98 one page facsimile from Paul Greenberg to BEW re: Peter Reilly (A/CP)
- 10/22/98 two page facsimile from Paul Greenberg to Peter Reilly re: suggested reply to Van Etten marked confidential and protected under the client-attorney privilege and work-product doctrine (A/CP)
- 10/22/98 four page facsimile from Ken Rudd to BEW marked confidential (A/CP)
- 10/22/98 three page facsimile from Peter Reilly of New Vision with 10/22/98 handwritten note from BEW on it (A/CP)

- Correspondence 5
 - 8/21/97 six-page fax BEW to CR (A/CP)
 - 8/20/97 correspondence BEW to SVE, JB and CR (A/CP)
 - 8/29/97 correspondence CR to BEW cc JB with enclosure (A/CP)
 - 8/14/97 BEW to JB with enclosure cc CR (A/CP)
 - 8/7/97 FDB to SVE (A/CP)

- 8/6/97 CR to BEW cc JB (A/CP)
- 8/5/97 Bernard A. Harrell to SVE (A/CP)
- 7/31/97 facsimile BEW to CR cc SVE and JB (A/CP)
- 7/30/97 two-page fax BEW to CR (A/CP)
- 7/15/97 13-page fax BEW to CR (A/CP)
- 7/8/97 five-page fax Pete Scanlon to BEW (A/CP)
- 7/7/97 six-page fax CR to BEW (A/CP)
- 7/3/97 11-page fax SVE to BEW and CR (A/CP)
- 7/2/97 seven-page fax BEW to CR (A/CP)
- 7/2/97 nine-page fax BEW to SVE (A/CP)
- 7/2/97 fax BEW to CR cc SVE (A/CP)
- 6/30/97 correspondence Christine Lanning of the North Carolina Department of Justice to BEW with handwritten notations (A/CP)
- 6/24/97 BEW to SVE cc CR and JB with enclosures bearing handwritten notations (A/CP)
- 6/24/97 correspondence CR to BEW with enclosures (A/CP)
- 6/13-15/97 transcript of telephone message from JAB to CTF (A/CP)
- 6/19/97 two-page fax Robert E. Zaytoun to BEW with handwritten notations of BEW
 (A/CP)
- 6/19/97 four-page fax BEW to SVE (A/CP)
- 6/18/97 facsimile correspondence BEW to SVE (A/CP)
- 6/12/97 nine-page fax BEW to Robert E. Zaytoun (A/CP)
- 6/12/97 10-page fax BEW to SVE (A/CP)
- 6/12/97 correspondence BEW to Robert E. Zaytoun cc SVE, CTF and CR with enclosures (A/CP)
- 6/12/97 facsimile BEW to SVE cc CR and CTF (A/CP)
- 6/12/97 fax BEW to Robert E. Zaytoun cc SVE, CTF and CR with enclosures (A/CP)
- 6/11/97 facsimile BEW to SVE (A/CP)
- 6/11/97 correspondence BEW to SVE cc CR, RSH, CS, LS, JAB, FDB with enclosures cc CTF, GMM without enclosures (A/CP)
- 6/11/97 facsimile BEW to SVE cc CR (A/CP)

Correspondence 6

- 1/15/98 13-page fax BEW to CR incomplete copy (A/CP)
- 10/28/97 correspondence CR to BEW cc JB with enclosures (A/CP)
- 10/27/97 six-page fax CR to BEW (A/CP)
- 10/16/97 correspondence CR to BEW cc JB and FDB (A/CP)
- 10/16/97 three-page fax BEW to CR (A/CP)
- 10/15/97 CR to BEW cc JB and FDB with enclosures (A/CP)
- 10/14/97 three-page fax CR to BEW (A/CP)
- 10/9/97 seven-page fax BEW to CR (A/CP)
- 10/6/97 copy of correspondence CR to Peter Lawson with handwritten notes BEW (A/CP)
- 9/5/97 two-page fax CR to BEW (A/CP)
- 9/4/97 fax BEW to CR cc SVE and JB (A/CP)
- 9/4/97 four-page fax BEW to CR (A/CP)
- 9/2/97 three-page fax BEW to CR (A/CP)

- 9/3/97 six-page fax CR to BEW (A/CP)
- 8/27/97 two-page fax BEW to CR (A/CP)
- 8/27/97 facsimile BEW to CR cc SVE and Jeff Hooks with enclosure (A/CP)
- 8/22/97 four-page fax CR to BEW (A/CP)

Correspondence 7

- 6/2/98 BEW to CR cc SVE and JB (A/CP)
- 4/29/98 three-page BEW to CR (A/CP)
- 4/8/98 correspondence CR to BEW (A/CP)
- 3/3/98 11-page fax BEW to Robert E. Zaytoun (A/CP)
- 3/3/98 eight-page fax BEW to Robert E. Zaytoun partial copy (A/CP)
- 3/3/98 facsimile BEW to Robert E. Zaytoun (A/CP)
- 3/2/98 three-page fax BEW to Marks Lane (A/CP)
- 3/2/98 four-page fax Marks Lane to BEW (A/CP)
- 2/19/98 four-page fax CR to BEW (A/CP)
- 1/15/98 facsimile BEW to CR (A/CP)
- 1/6/98 Memo Alan Woodlief to BEW (A/CP)
- 12/19/97 BEW to CR (A/CP)
- 11/18/97 two-page fax CR to BEW (A/CP)
- 11/14/97 correspondence CR to BEW cc JB and FDB (A/CP)
- 11/7/97 four-page fax CR to Peter Lawson regarding Lloyd Ayers (A/CP)

North Carolina 6 Attorney General Correspondence

- 8/28/98 one-page fax SVE to BEW with notes from SVE to BEW (A/CP)
- Undated miscellaneous handwritten notes with handwritten notes BEW (WP)
- 3/6/98 nine-page fax JAB to BEW (A/CP)
- 8/19/98 four-page fax BEW to JB (A/CP)
- 8/19/98 four-page fax BEW to CR (A/CP)
- 8/19/98 four-page fax BEW to SVE (A/CP)
- 7/27/98 correspondence CR to BEW (A/CP)
- 7/13/98 seven-page fax BEW to CR (A/CP)
- 7/10/98 six-page fax BEW to CR (A/CP)
- 7/10/98 three-page fax BEW to CR (A/CP)
- 6/22/98 CR to BEW (A/CP)
- 6/8/98 BEW copy of correspondence CR to Christine Lanning cc SVE (A/CP)
- 4/16/98 17-page fax Alan Woodlief to BEW (A/CP)

CTF Material

- 5/21/97 nine-page fax SVE to CTF plus additional pages (A/CP)
- May 1997 draft agreement between CTF and Marlowe Builders, Inc. (WP)
- 5/21/97 21-page copy of the Insider (WP)
- 5/21/97 draft memo re IHI logo entitled Draft for Client Review Only with handwritten notations (WP)
- 5/21/97 two-page fax Garrick Francis to BEW, CTF and GMM re advertising issues (WP)

- Undated Miscellaneous N.C.G.S. § 14-291.10 (WP)
- 5/21/97 nine-page fax SVE to CTF (A/CP)
- 5/22/97 Volume 5, No. 98 of the Insider (WP)
- 5/22/97 six-page fax James Y. Kurr to BEW (A/CP)
- 5/30/97 four-page fax SVE to CTF (A/CP)
- Undated invitation to NC Legislative Black Caucus Foundation, Inc. function with handwritten notes (WP)
- CTF undated phone list NC Legislators with handwritten notes (WP)
- 5/14/97 three-page fax James Y. Kurr to CTF
- 5/16/97 three-page fax CTF to SVE
- 6/11/97 correspondence BEW to SVE cc CR, RSH, CS, LS, JAB and FDB with enclosures cc CTF and GMM without enclosures
- 7/18/97 four-page fax CR to CTF draft agreement between Michael F. Easley, Attorney General and IHI, SVE, LS and CS with strickouts (WP)
- 5/25/97 Amway document from the World Wide Web entitled "How Hard Is It To Get That Pen" with note from BEW to CTF attached (WP)

· Attorney Notes

- 3/25/99 Rhonda Peditto copy of email transmission from Rhonda Peditto to BEW (A/CP)
- 3/5/98 BEW handwritten notes (WP)
- 5/21/97 transcript of message from JAB to BEW (WP)
- 7/21/98 transcript of message from Alan Hirsch to BEW (WP)
- 7/20/98 handwritten notes BEW (WP)
- 7/20/98 transcript of message from Alan Hirsch to BEW (WP)
- 5/7/98 handwritten notes BEW (WP)
- Miscellaneous handwritten notes BEW attached to 4/20/98 trial calendar (WP)
- Miscellaneous handwritten notes BEW (WP)
- 2/27/98 handwritten notes BEW (WP)
- 2/25/98 transcript of message from Alan Hirsch to BEW (WP)
- 2/24/98 handwritten notes BEW (WP)
- 9/18/97 SEC litigation release 15500 (WP)
- 1/6/98 seven-page fax Alan Woodlief to BEW (WP)
- Undated transcript of message from Christine Lanning to BEW (WP)
- Miscellaneous handwritten notes BEW (WP)
- 8/13/97 handwritten notes BEW (WP)
- 7/31/97 correspondence BEW to CR cc SVE and JB with enclosures (WP)
- 7/28/97 handwritten notes BEW (WP)
- 7/7/97 handwritten notes BEW (WP)
- 6/25/97 handwritten notes BEW (WP)
- 6/17/97 handwritten notes BEW (WP)
- 6/17/97 handwritten notes BEW (WP)
- 6/16/97 handwritten notes BEW (WP)
- 6/16/97 memo BEW to File (WP)
- 6/2/97 16-page fax Christine Lanning to BEW with handwritten notes and edits from BEW (WP)
- Undated memo from Julie Bell to CTF, BEW, GMM, Margie Hall and Elaine Tarkington (WP)

- 5/20/97 seven-page fax Garrick Francis and Roger Friedenson to SVE and JB with handwritten notes and edits BEW (WP)
- Draft agreement between Michael Easley and IHI with some notations plus three additional copies (WP)
- Undated transcript of message from JAB to BEW (WP)
- Undated memo from Julie Bell to CTF, BEW, GMM, Margie Hall and Elaine Tarkington (WP)
- Undated memo from Julie Bell to CTF, BEW, GMM, Margie Hall and Elaine Tarkington (WP)
- 5/8/97 handwritten notes BEW with attachment (WP)
- 5/5/97 internet download of AG Web Site (WP)
- 5/25/97 handwritten notes BEW (WP)
- Undated draft agreement between Mike Easley and IHI with numerous GMM edits (WP)
- 5/21/97 handwritten notes BEW (WP)
- 5/19/97 handwritten notes BEW (WP)
- Draft AG agreement with handwritten notes (WP)
- Undated three draft copies of Complaint and Motion to Preliminary Injunction each with some handwritten notes or edits (WP)
- 5/16/97 handwritten notes BEW (WP)
- 5/9/97 handwritten notes BEW (WP)
- 5/5/97 handwritten notes BEW(WP)
- 5/1/97 handwritten notes BEW (WP)
- North Carolina Attorney General Documents from Ralph McKinney
 - 8/25/98 handwritten note from Angie Stewart to BEW with large menagerie of documents, newspaper clippings, handwritten notes, letters, etc. from Ralph McKinney attached (A/CP)
- Attorney Notes
 - undated 3 draft copies of Complaint and motion for preliminary injunction each with some handwritten notes or edits (WP)
 - 5-16-97; 5-9-97; 5-5-97; 5-1-97; handwritten notes BEW (WP)
- North Carolina Attorney General Documents from Ralph McKinney
 - 8-25-98 handwritten notes from Angie Stewart to BEW with large managerie of documents, newspaper clippings, handwritten notes, letters, etc. from Ralph McKinney attached (WP)

- Miscellaneous Documents
 - 10/9/98 draft Affidavit of Chris Reid (WP)
 - 10/9/98 IHI Memo CR to BEW (WP)(A/CP)

- Undated IHI Memo Toby Kandies to CR, Pete Scanlon and Pete Otto cc Sales and Training re Unique Opportunities Meeting with attachments (WP)(A/CP)
- 10/8/98 letter from Jeanette Aikens to CR (A/CP)
- 9/15/98 Memo from Wendy Rainer to AEF cc CR and Peter Scanlon re Doug Sims and David Tillman with attachements (A/CP)
- 10/9/98 16-page fax CR to BEW (A/CP)
- 10/9/98 seven-page fax CR to BEW (A/CP)
- 10/9/98 one-page fax CR to BEW (A/CP)

Please note the last three or four faxes from CR to BEW were partials of a 28-page fax CR attempted to send BEW

10/2/98 fax from Tom Stroker to Steve Brown (A/CP)

10/5/98 nine-page fax CR to AEF (A/CP)

9/15/98 copy of memo from Wendy Rainer to AEF cc CR and Peter Scanlon re Doug Sims and David Tillman (A/CP)

10/5/98 two-pages of nine-page fax from CR to AEF (A/CP)

- International Heritage, Inc. Re: Douglas L. Sims, et al.
 - 9/22/98 one page of fax from IHI entitled Fax on Demand (WP)
 - Undated draft letter to IHI representatives seeking refunds (WP)
 - Undated draft letter to IHI rep regarding work in progress on refunds (WP)
 - Undated draft of IHI General Release (WP)
 - 5/13/98 draft letter to Crawford Powell (WP)
 - Undated draft letter to representative attorney (WP)
 - Undated distributor inquiry re Jessie Parraine (WP)
 - 9/22/98 additional account inquiry re Jessie Parraine (A/CP)
 - 9/24/98 AEF copy of email transmission from Wendy Rainer to BEW cc AEF (A/CP)
 - 11/6/98 Memo from Rhonda Peditto to IHI re deposition cancellation (A/CP)
 - 10/28/98 correspondence from Rhonda Peditto to Beverly Har re deposition cancellations
 with handwritten note from BEW to AEF included and draft notice of deposition attached
 (A/CP)
 - 10/1/98 nine-page fax BEW to CR (A/CP)
- Douglas Sims (Tillman/Unique) Attorney Notes
 - 4/23/99 BEW transcript of voice mail communication from Steve Reid (WP)
 - 10/23/98 miscellaneous handwritten notes (WP)
 - 12/13/99 AEF handwritten notes (WP)
 - Undated AEF copy of email transmission from AEF to BEW (WP)(A/CP)
 - 10/16/98 handwritten notes BEW (WP)
 - 9/24/98 Elaine Tarkington copy of email transmission BEW to Elaine Tarkington (WP)
- Miscellaneous Documents
 - Undated Chris Reid print-out of contact information for Paul Greenberg (WP)
 - Undated Memo from Wendy Rainer to AEF cc CR and Peter Scanlon (A/CP)
 - Undated copies of North Carolina Tort Law and Hornbook sections (WP)

Client Documents

- 9/11/98 draft letter from Peter Scanlon to Infinity Marketing regarding Doug and Paige Sims (WP)
- 9/11/98 Peter Scanlon to David and Lita Tillman (WP)

BOX 96W342I 127

- Miscellaneous Documents
 - Undated deposition summary of Eric S. Block (WP)
 - 4/1/98 Julie Bell copy of email transmission from Ginny Marshall to Julie Bell with draft documents attached and additional Ginny Marshall copy of email transmission from Ginny Marshall to Julie Bell and handwritten notes of Julie Bell attached (WP)
 - Undated BEW handwritten deposition notes re Eric Block (WP)
 - Undated outline for Block deposition with attachment of documents and records to be used for examination and cross-examination (WP)

Correspondence

- 8/10/98 correspondence BEW to GMM cc JB with enclosures (A/CP)
- 7/1/98 BEW to GMM with enclosures (A/CP)
- 5/18/98 BEW to SVE with enclosures (A/CP)
- 3/5/98 BEW to CR with enclosures (A/CP)
- 2/10/98 BEW to CR with enclosures (A/CP)
- 2/2/98 BEW to CR with enclosures (A/CP)
- 1/27/98 BEW to CR with enclosures (A/CP)
- 1/20/98 BEW to CR with enclosures (A/CP)
- 12/23/97 BEW to CR (A/CP)
- 11/4/97 BEW to CR with enclosures (A/CP)
- 11/4/97 thee-page fax Shannon Zeko to BEW (A/CP)
- 10/30/97 four-page fax BEW to CR (A/CP)
- 10/27/97 12-page fax CR to BEW (A/CP)

Attorney Notes

- Miscellaneous handwritten note (WP)
- 11/4/97 handwritten note BEW (WP)
- 10/28/97 Wood & Francis internal document (WP)

Miscellaneous Documents

- undated deposition summary of Eric S. Block (WP)
- 4-1-98 Julie Bell copy of email transmission from Ginny Marshall to Julie Bell with draft documents attached and additional Ginny Marshall copy of email transmission from Ginny Marshall to Ginny Bell and handwritten notes of Julie Bell attached (WP)
- undated BEW handwritten notes on deposition re: Eric Block (WP)

 undated outline for Block deposition with attachments of documents and records to be used for examination and cross-examination (WP)

Correspondence

- 8-10-98 correspondence from BEW to GMM cc'd JB w/ encl (A/CP)
- 7-1-98 correspondence from BEW to GMM with attachment (A/CP)
- 5-18-98 correspondence from BEW to SVE with attachment (A/CP)
- 3-5-98 correspondence from BEW to CR with attachment (A/CP)
- 2-10-98 BEW to CR with attachment (A/CP)
- 2-2-98 BEW to CR with attachment (A/CP)
- 1-27-98 BEW to CR with attachment (A/CP)
- 1-20-98 BEW to CR with attachment (A/CP)
- 12-23-97 BEW to CR (A/CP)
- 11-4-97 BEW to CR with attachment (A/CP)
- 11-4-97 three page fax Shannon Zeko to BEW (A/CP)
- 10-30-97 four page facsimile from BEW to CR (A/CP)
- 10-27-97 twelve page facsimile from CR to BEW (A/CP)

Attorney notes

- undated miscellaneous handwritten notes (WP)
- 11-4-97 handwritten notes of BEW (WP)
- 10-28-97 Wood & Francis internal document (WP)

BOX 96W342I 129

- · Miscellaneous Documents
 - 1/19/99 copy of handwritten note from Rhonda Peditto to Julie Bell with attachment of check copies (A/CP)

Attorney Notes

- 12/10/98 draft letter from BEW to Holmes P. Hardin with handwritten notes on blue Post-Its from Julie Bell to BEW attached (WP)
- 3/2/99 Memo from BEW to Julie L. Bell (A/CP)
- 3/13/98 draft letter from BEW to Joe McLeod with enclosures which was not delivered (WP)
- Miscellaneous handwritten notes BEW (WP)
- 3/3/98 handwritten notes BEW (WP)
- 2/3/98 handwritten notes BEW (WP)
- 2/12/97 handwritten notes BEW (WP)
- 12/10/97 handwritten notes BEW (WP)
- Undated payment log IHI Taylor (WP)
- Miscellaneous floppy disc from Wood & Francis (WP)
- 7/15/97 memo from BEW to John Austin (WP)
- 10/30/97 handwritten notes BEW (WP)





PEGGY B. DEANS, CLERK U.S. BANKRUPTCY COURT RASTERN DISTRICT OF N.G.,

- 11/5/97 Julie Bell copy of email transmission from BEW to Julie Bell (WP)
- 10/7/97 handwritten notes BEW (WP)
- 7/8/97 handwritten notes BEW (WP)
- 8/27 handwritten notes BEW (WP)
- 8/26/97 handwritten notes BEW (WP)
- 8/22/97 handwritten notes BEW (WP)
- 8/12/97 handwritten notes BEW (WP)
- 8/8/97 handwritten notes BEW (WP)
- 8/4/97 handwritten notes BEW (WP)
- 8/5/97 handwritten notes BEW (WP)
- 7/28/97 handwritten notes BEW (WP)
- 7/29/97 handwritten notes BEW (WP)
- 7/25/97 handwritten notes BEW (WP)
- 7/10/97 handwritten notes BEW (WP)
- 2/29/95 handwritten notes BEW (WP)
- 7/25/97 handwritten notes BEW (WP)
- 7/23/97 handwritten notes BEW (WP)
- 7/22/97 handwritten notes BEW (WP)
- 7/15/97 handwritten notes BEW (WP)
- 7/16/97 handwritten note from SVE (WP)
- 7/10/97 bank account inquiry Dobb & Weldon (WP)
- 7/10/97 handwritten notes (WP)
- 7/9/97 handwritten notes BEW (WP)
- Undated Defendant List of Defendants in the Cedric Dobbins, et al. matter with corresponding addresses (WP)
- 7/9/97 Ginny Marshall copy of email transmission from Ginny Marshall to John Austin (A/CP)
- 7/7/97 handwritten notes BEW (WP)
- 7/3/97 handwritten notes BEW (WP)
- 7/1/97 handwritten notes BEW (WP)
- 7/1/97 draft Temporary Restraining Order (WP)
- 6/30/97 handwritten notes BEW (WP)
- 6/26/97 handwritten notes BEW (WP)
- Undated Subpoena list (WP)
- 7/11/97 invoice of Turner Printing Services, Inc. (WP)

- Correspondence 3
 - 5/9/97 BEW to SVE with enclosure cc JB (A/CP)
 - 5/8/97 three-page fax BEW to SVE (A/CP)
 - 5/8/97 three-page fax BEW to JB (A/CP)
 - 5/8/97 seven-page fax BEW to SVE (A/CP)
 - 5/8/97 seven-page fax BEW to JB (A/CP)
 - 5/6/97 three-page fax BEW to SVE (A/CP)
 - 5/6/97 three-page fax BEW to JB (A/CP)
 - 5/6/97 three-page fax BEW to DH (A/CP)

- 5/6/97 facsimile BEW to SVE (A/CP)
- 5/6/97 facsimile BEW to SVE cc B. Davis Horn, JAB, CTF and FDB (A/CP)
- 5/6/97 three-page fax BEW to B. Davis Horn, Jr., Esq. (A/CP)
- 5/6/97 BEW to SVE (A/CP)
- 5/6/97 BEW to JAB (A/CP)
- 5/6/97 three-page fax BEW to FDB (A/CP)
- 5/6/97 BEW to SVE with enclosure (A/CP)
- 5/5/97 15-page fax BEW to FDB partial copy (A/CP)
- 5/5/97 15-page fax BEW to SVE partial copy (A/CP)
- 5/5/97 BEW to SVE with enclosures (A/CP)
- 5/1/97 two-page fax Jeff Trendel to BEW (A/CP)
- 4/30/97 two-page fax Jeff Trendel to BEW (A/CP)
- 4/29/97 two-page fax Jeff Trendel to BEW (A/CP)
- 4/29/97 BEW to SVE with cc JB with enclosures (A/CP)
- 4/25/97 three-page fax BEW to SVE, DH and Jeff Trendel (A/CP)
- 4/28/97 six-page fax BEW to Jeff Trendel (A/CP)
- 4/24/97 three-page fax Jeff Trendel to BEW (A/CP)
- 4/23/97 five-page fax Jeff Trendel to BEW (A/CP)
- 4/23/97 11-page fax BEW to SVE partial copy (A/CP)
- 4/21/97 BEW to SVE with enclosure (A/CP)
- 4/18/97 BEW to SVE with enclosures (A/CP)
- 4/18/97 three-page fax BEW to JB (A/CP)
- 4/18/97 IHI Memo DH to BEW re IHI not ship-verified orders and analysis (A/CP)
- 4/17/97 IHI Memo DH to BEW (A/CP)
- 4/14/97 three-page fax Jeff Trendel to BEW (A/CP)
- 4/18/97 BEW to SVE with enclosures (A/CP)
- 4/17/97 seven-page fax BEW to Alan Woodlief (A/CP)
- 4/17/97 fax correspondence BEW to Alan Woodlief (WP)
- 4/17/97 BEW to SVE with enclosures (A/CP)

Correspondence 4

- 4/3/98 Robert Hukezalie to BEW with attachment (A/CP)
- 7/21/98 five-page fax BEW to Robert Hukezalie (A/CP)
- 5/18/98 BEW to SVE with enclosure (A/CP)
- 5/18/98 BEW to GMM with enclosure cc JB (A/CP)
- 2/24/98 BEW to SVE cc JB and CR (A/CP)
- 2/10/98 two-page fax CR to BEW handwritten notes BEW (A/CP)
- 2/5/98 BEW to SVE with enclosures (A/CP)
- 10/8/97 BEW to SVE cc JB (A/CP)
- 6/18/97 BEW to SVE with enclosures (A/CP)
- 6/17/97 six-page fax BEW to SVE (A/CP)
- 6/11/97 BEW to SVE with enclosures (A/CP)
- 6/10/97 facsimile BEW to SVE cc JB (A/CP)
- 6/2/97 30-page fax BEW to SVE partial copy (A/CP)
- 6/10/97 four-page fax Jeff Trendel to BEW (A/CP)
- IHI v. First Data

- Undated miscellaneous note attached to file (WP)
- 2/8/98 Memo from R. Gene Davis to BEW (A/CP)
- 3/12/98 draft letter from BEW to Kiran H. Metha, Esq. (WP)
- 3/12/98 draft letter from BEW to JB (WP)
- 3/12/98 draft letter from BEW to Johnny M. Loper, Esq. (WP)
- Undated draft Plaintiff's Second Set of Interrogatories to Defendants First Data in the IHI v. First Data, et al. litigation (WP)
- Undated Motion to Compel in the IHI v. First Data litigation (WP)
- Undated draft Calendar Request (WP)
- 6/25/97 draft letter from BEW to Sallie Kearns, Trial Court Administrator (WP)
- 3/31/97 BEW to SVE (A/CP)
- 3/16/97 16-page fax BEW to SVE (A/CP)
- 3/25/97 four-age fax BEW to SVE (A/CP)
- 3/25/97 facsimile BEW to SVE (A/CP)
- 3/25/97 six-page fax BEW to SVE (A/CP)
- 3/13/97 11-page fax Linda Halstead to BEW (A/CP)
- 3/21/97 two-page fax Clark A. Jones, CPA to BEW re merchant processing update (A/CP)
- 3/21/97 two-page fax BEW to AW (A/CP)
- 3/20/97 facsimile BEW to SVE (A/CP)
- 3/20/97 four-page fax BEW to SVE (A/CP)
- 3/12/97 transcript of voice mal from Susan Kobel, IHI to BEW (A/CP)
- 3/11/97 13-page fax Clark Jones to BEW (A/CP)
- 3/10/97 BEW to SVE cc Clark Jones (A/CP)
- Research Re: Rule 52(a)(2)
 - Undated three North Carolina Court of Appeals decisions
- Attorney Notes
 - 11/15/98 handwritten notes BEW (WP)
 - 7/22/98 handwritten notes BEW (WP)
 - 6/22/98 handwritten notes BEW (WP)
 - 2/8/98 Memo Gene Davis to BEW with attachment (WP)(A/CP)
 - 1/29/98 handwritten notes BEW (WP)
 - Undated list of witnesses or individuals (WP)
 - 12/23/97 handwritten notes BEW (WP)
 - 10/15/97 transcript message from Kelvin Carvana(?) to BEW (WP)
 - Miscellaneous handwritten notes BEW (WP)
 - 6/16/97 handwritten notes BEW (WP)
 - 6/9/97 handwritten notes BEW (WP)
 - 6/10/97 handwritten notes BEW (WP)
 - 5/30/97 Memo Julie Bell to BEW with attachments (WP)(A/CP)
 - 5/6/97 handwritten notes BEW (WP)
 - 5/2/97 handwritten notes BEW (WP)
 - 4/25/97 handwritten notes BEW (WP)

- 4/24/97 handwritten notes BEW (WP)
- 4/23/97 transcript of message from Randy Dessau to BEW (WP)
- 4/18/97 transcript of message from Randy Dessau to BEW (WP)
- 4/18/97 transcript of message from Randy Dessau to BEW (WP)
- 4/24/97 transcript of message from Randy Dessau to BEW (WP)
- 4/17/97 handwritten notes BEW (WP)
- 4/15/97 handwritten notes BEW (WP)
- 4/18/97 handwritten notes BEW (WP)
- 4/9/97 handwritten notes BEW (WP)
- 4/11/97 transcript of message from Randy Dessau to BEW (WP)
- 4/11/97 transcript of message from DH to BEW (WP)
- Undated handwritten notes of GMM (WP)
- Undated miscellaneous notes GMM (WP)
- 4/3/97 handwritten notes BEW (WP)
- 4/2/97 handwritten notes BEW (WP)
- 4/2/97 handwritten notes BEW (WP)
- 4/1/97 handwritten notes BEW (WP)
- 4/1/97 handwritten notes BEW (WP)
- 3/31/97 handwritten notes BEW (WP)
- 3/21/97 four-page fax Steven McDermitt to BEW (A/CP)
- 3/20/97 handwritten notes BEW (WP)
- 3/17/97 handwritten notes BEW (WP)
- 3/13/97 handwritten notes BEW (WP)
- 3/11/97 handwritten notes BEW (WP)
- 3/10/97 handwritten notes (WP)

S-1 Picked Up from Johnny Loper

3/3/97 SEC Amendment to Form S-1 Registration Statement for International Heritage,
 Inc. with minor notations and edits

Correspondence 2

- 4/10/97 BEW to SVE with enclosures (A/CP)
- 4/7/97 nine-page fax DH to GMM (A/CP)
- 4/9/97 five-page fax BEW to DH partial copy (A/CP)
- 4/9/97 BEW to SVE with enclosures (A/CP)
- 4/9/97 three-page fax BEW to Jeff Trendel (A/CP)
- 4/8/97 three-page fax BEW to SVE (A/CP)
- 4/8/97 two-page fax BEW to Jeff Trendel (A/CP)
- 4/7/97 five-page fax GMM to Michael Decker, IHI (A/CP)
- 4/7/97 five-page fax GMM to DH (A/CP)
- 4/4/97 four-page fax BEW to SVE (A/CP)
- Undated draft Affidavit of Stanley Van Etten in the IHI/First Data litigation (WP)
- 4/4/97 four-age fax BEW to Dawn McIntyre partial copy (WP)
- Undated draft Affidavit of Dawn McIntyre in the IHI/First Data litigation (WP)
- 4/4/97 29-page fax from Mike at IHI to BEW (A/CP)

- 4/4/97 correspondence from Eileen Smith to SVE re merchant account with handwritten notes BEW (A/CP)
- 4/3/97 four-page fax BEW to SVE (A/CP)
- 4/3/97 BEW to SVE (A/CP)
- 4/2/97 five-page fax Jeff Hooks to BEW (A/CP)
- 4/2/97 21-page fax Jeff Trendel to BEW (A/CP)
 4/2/97 correspondence BEW to Susan Kobel, IHI cc Jeff Trendel and SVE with enclosure (A/CP)
- 4/2/97 eight-page fax BEW to Clark Jones (A/CP)

- IHI/First Data Deposition Summary Stan Van Etten
 - 2/13/98 Memo from Gene Davis to BEW re deposition summary of SVE (WP)
- Deposition of Stan Van Etten
 - 4/2/97 handwritten notes of BEW with 3/13/97 correspondence from Ralph Shalom to BEW attached (WP)
 - 3/13/97 correspondence from BEW to Ralph Shalom facsimile attached (A/CP)
- IHI/First Data Deposition Summary Steve McDermitt
 - 2/8/98 Memo from Gene Davis to BEW (WP)(A/CP)
 - 2/8/98 Memo from Gene Davis to BEW deposition summary April 4, 1997 (WP)(A/CP)
- Deposition of Steve McDermitt
 - Undated handwritten notes BEW with attachment of exhibits from McDermitt's deposition used to questioning (WP)
- Research
 - Undated numerous copies of North Carolina Court of Appeals and other court decisions (WP)
 - Copies of ALR sections and Hornbook sections (WP)
 - Undated draft of Brief of Support of Plaintiff's Motion to Preliminary Injunction in IHI v. First Data litigation with brief BEW notes (WP)
 - 3/11/97 20-page fax from Alan Woodlief to BEW (WP)
- International Heritage First Data Release of Funds
 - Undated draft Motion to Compel the Release of Funds in IHI/First Data litigation (WP)
 - 1/26/98 Memo from Gene Davis to File (WP)
 - 1/26/98 Memo from Gene Davis to BEW with attachment (WP)
- Blank

- 2/8/98 Memo from Gene Davis to BEW (WP)(A/CP)
- 2/13/98 Memo from Gene Davis to BEW with handwritten notes of BEW on yellow Post-Its attached (WP)(A/CP)

Miscellaneous Documents

- 7/7/97 four-page fax from Heather at IHI to BEW (A/CP)
- 7/7/97 three-page fax from Dawn McIntyre to BEW partial copy (A/CP)
- 7/2/97 three-page fax from Heather Markham to BEW (A/CP)
- 7/2/97 21-page fax from Heather Markham to BEW (A/CP)
 5/14/97 two-page fax from Clark Jones to BEW (A/CP)

First Data Audit Detail

5/12/97 IHI Memo from DH to BEW cc SVE and JB with attachment (A/CP)

Miscellaneous Documents

- 5/15/97 three-page from Clark Jones to BEW (A/CP)
- 5/16/97 43-page fax Clark Jones to BEW partial copy (A/CP)
- 5/12/97 three-page fax Clark Jones to BEW (A/CP)
- 5/12/97 five-page fax Clark Jones to BEW (A/CP)
- 5/12/97 three-page fax Clark Jones to BEW (A/CP)
- 5/12/97 three-page fax Clark Jones to BEW (A/CP)
- 5/12/97 three-page fax Clark Jones to BEW (A/CP)
- 5/12/97 three-page fax Clark Jones to BEW (A/CP)
- 5/12/97 IHI Memo DH to BEW with attachment (A/CP)
- 5/14/97 three-page fax Jeff Trendel to BEW (A/CP)
- 5/14/97 Memo from Jeff Trendel to DH re information for Brent Wood with attachment (A/CP)
- 5/15/97 three-page fax Clark Jones to BEW (A/CP)
- 5/15/97 three-page fax Clark Jones to BEW (A/CP)
- 5/15/97 three-page fax Clark Jones to BEW (A/CP)
- 7/17/97 Postmarked white envelope from IHI to BEW containing the following: (A/CP)
 - 7/16/97 memo from Keith McKay to BEW cc JB with attachments (A/CP)
 - 7/14/97 CR to BEW cc JB and Gary Williams with attachment (A/CP)
 - 7/17/97 IHI memo from Heather Markham to BEW cc JB, CR, Gary Williams and Pete Scanlon with attchment (A/CP)

Woodlief Research on Preliminary Injunction

- 4/23/97 draft Brief in Support of Plaintiff's Motion for Preliminary Injunction (WP)
- 4/4/97 Steve McDermitt deposition summary with floppy disc labeled IHI Depos attached followed by North Carolina case law and case law from other jurisdictions regarding preliminary injunctions (WP)

- IHI/First Data Documentation Used to Provide Responses to First Discovery of Defendants
 - Undated miscellaneous handwritten note BEW (WP)
 - 6/9/98 correspondence GMM to BEW with enclosure consisting of draft interrogatory responses and 19 sets of documents for production (WP)(A/CP)
 - Undated Centura Bank records labeled Merchant Statements from GMM with note from GMM to BEW attached on yellow post-it (WP)(A/CP)
 - 6/30/98 six-page fax Linda Halsteadt to Elaine Tarkington partial copy (A/CP)
 - Undated draft Defendant's First Set of Interrogatories and First Request for Production of Documents to Plaintiff in the IHI v. First Data, et al. litigation with extensive handwritten notes and edits from BEW (WP)

IHI Research

 5/21/97 Approximately 700 pages of research and documentation from Lexis regarding various topics (WP)

BOX 96W342I 137

- Debra Braderway
 - 6/30/98 two-page fax DH to MV transmission page (A/CP)
 - 6/30/98 two-page fax DH to DL transmission page (A/CP)
 - 5/22/98 two-page fax DH to MV transmission page (A/CP)
 - 5/22/98 two-page fax DH to MV transmission page (A/CP)
 - 6/30/98 two-page fax DH to MV transmission page (A/CP)
 - 6/30/98 two-page fax DH to DL transmission page (A/CP)
 - 6/18/98 two-page fax DH to Chris Willis transmission page (A/CP)
 - 5/22/98 two-page fax DH to MV transmission page (A/CP)
 - 5/22/98 two-page fax DH to MV transmission page (A/CP)

Dechart, Price and Rhoads

- 7/23/98 two-page fax DH to MV (A/CP)
- 7/21/98 two-page fax DH to MV (A/CP)
- 7/15/98 nine-page fax DH to DL partial copy (A/CP)
- 7/14/98 three-page fax DH to MV (A/CP)
- 6/13/98 two-page fax DH to Dennis Lawson (A/CP)
- 6/30/98 17-page fax DH to MV transmission page only (A/CP)
- 6/29/98 handwritten note from MV to DH (A/CP)
- 6/18/98 13-page fax DH to MV partial copy (A/CP)
- Sky Mark Avenue, Mississauga
- 2/2/98 IHI Memo from GMM to DH (A/CP)

MTI/E*Net

- 3/26/97 facsimile BEW to DH with attachment (A/CP)
- Memos, Research Re: First Data
 - 5/12/97 IHI Memo from DH to BEW cc SVE and JB with attachments (A/CP)
 - 5/14/97 Memo from Jeff Trendel to DH re: information for BEW with attachment (A/CP)
 - 5/6/97 three-page fax BEW to JB with handwritten note on yellow post-it from JB (A/CP)
 - 4/25/97 three-page fax BEW to SVE, DH, Jeff Trendel (A/CP)
 - 4/18/97 three-page fax BEW to JB (A/CP)
 - 4/9/97 five-page fax BEW to DH (A/CP)
 - 4/18/97 IHI Memo from DH to BEW with attachments (A/CP)
- First Data Affidavit
 - 3/31/97 Correspondence from BEW to SVE cc GMM, David Brown, JB, Jeff Hooks, DH, Dawn McIntyre, Clark Jones and Jeff Trendel (A/CP)
- Communications Re: BTI
 - 4/7/97 Correspondence GMM to Chris Lynch, Scott L. Cunningham, Wyrick, Robbins cc Larry Robbins, SVE, L. Stephanie Harris, DH, Peter Lofton, President, BTI (A/CP)
- Estate Info
 - 2/25/97 Correspondence GMM to JAB (A/CP)
 - 12/30/96 Memo from John Austin to GMM (A/CP)
 - 12/30/96 Correspondence GMM to DH cc SVE (A/CP)
- SVE
 - 5/21/97 facsimile correspondence BEW to DH (A/CP)
 - 5/8/97 four-page fax DH to BEW (A/CP)
- Notes from Meeting with Dan, Bill and Applewhite
 - Undated outline entitled Multi-Level Marketing Highlights (WP)
 - Miscellaneous handwritten notes (WP)
- WYR&P Correspondence with Gallagher and Archambeault, P.C.
 - 3/7/96 16-page fax FDB to SVE and JB (A/CP)
 - 3/7/96 three-page fax FDB to SVE and JB (A/CP)
- WYR&P Correspondence To/From Stan
 - 3/22/96 12-page fax from GMM to SVE (A/CP)

- 1/23/96 Correspondence FDB to SVE cc JAB (A/CP)
- 9/25/95 Correspondence Sheila Stansill to DA (A/CP)
- 7/3/95 Correspondence from FDB to SVE (A/CP)
- WYR&P Correspondence To/From Me
 - 3/21/96 one-page fax from DH to FDB and DA (A/CP)
 - 11/6/95 Correspondence from DA to DH cc SVE and FDB, Esq. with attachment (A/CP)
 - 9/14/95 Correspondence from DA to DH (A/CP)
- Brent Wood
 - 5/26/98 Yellow Post-It Note from DH to BEW (A/CP)
 - 5/22/98 two-page fax from DH to Mile MV transmission page (A/CP)
 - 5/22/98 two-page fax from DH to Mile MV transmission page (A/CP)
 - 5/21/98 10-page fax from DH to Mile MV (A/CP)
- Miscellaneous Notes
 - Undated handwritten note from GMM to BEW (A/CP)
- James Tucker
 - 6/30/98 17-page fax from DH to MV (A/CP)
- Denise Marsh
 - 7/10/98 IHI Memo from GMM to DH, Kevin Jones, Ashley Markham, Dawn McIntyre
 cc JB with copy of Plaintiff's Second Request for Production of Documents to Defendant
 International Heritage, Inc. attached (A/CP)

BOX 96W342I 138 / BOX 96W342I 139 IHI Bankruptcy A and B (were the former designations)

- Correspondence IV IHI Bankruptcy
 - 9/21/99 Draft settlement agreement with notations from BEW (WP)
 - 8/9/99 Draft settlement agreement and release (WP)
 - Undated draft or copy of settlement agreement (WP)
 - 1/12/99 Memo from SVE to BEW (A/CP)
 - 6/1/99 Correspondence BEW to SVE cc RB (A/CP)
 - 5/26/99 Correspondence Rhonda Peditto to SVE with enclosure (A/CP)
 - 5/19/99 Correspondence BEW to SVE (A/CP)
 - 5/19/99 Correspondence Rhonda Peditto to SVE with enclosure (A/CP)
 - 4/8/99 Facsimile BEW to SVE (A/CP)
 - 4/6/99 BEW to SVE (A/CP)
 - 4/6/99 BEW to SVE (A/CP)
 - 2/12/99 three-page fax SVE to BEW (A/CP)

- 3/19/99 BEW to SVE (A/CP)
- 3/19/99 BEW to SVE (A/CP)
- Correspondence III IHI Bankruptcy
 - 3/10/99 BEW to SVE (A/CP)
 - 2/9/99 BEW to Susan Halpern cc SVE (A/CP)
 - Undated draft Opposition of SVE to Trustee's Application with handwritten notes, edits and inserts from BEW (WP)
 - 1/28/99 nine-page fax from Steven H. Lang to BEW and Hunter Wyche, Esq. (A/CP)
 - 1/21/99 three-page fax Anna Washburn to BEW (A/CP)
 - 1/21/99 five-page fax AW to BEW (A/CP)
 - 1/19/99 three-page fax SVE to BEW (A/CP)
 - 1/20/99 Rhonda Peditto copy of email transmission from RB to Rhonda Peditto cc BEW,
 Steven Lang and Michael Wilenski (A/CP)
 - 11/30/98 SEC transmission to BEW attached (A/CP)
 - 1/13/99 BEW to SVE (A/CP)
 - 1/11/98 two-page fax Jennifer Doherty to BEW (A/CP)
 - 1/8/99 24-page fax AW to BEW (A/CP)
 - 12/28/98 SVE to BEW (A/CP)
 - 12/16/98 five-page fax AW to BEW (A/CP)
 - 1/6/99 seven-page fax AW to BEW (A/CP)
 - 1/5/99 Correspondence from BEW to IHI Board of Directors including LS, Yvonne Eickenrock, GMM, CR, JB, CS, Barry Eickenrock, Hukezalie, Harry Baines, Angie Stewart, Bob Chommers, Ken Rudd, Kevin Jones, Jack Hemmer (A/CP)
 - 1/5/99 Correspondence BEW to SVE (A/CP)
 - 12/18/98 Facsimile BEW to SVE cc Holmes Hardin and Craig Adams (A/CP)
 - 12/22/98 BEW to Hunter Wiche cc SVE (A/CP)

• Correspondence II IHI Bankruptcy

- 12/10/98 Correspondence BEW to IHI Board of Directors and Officers including LS, Yvonne Eickenrock, GMM, Chris Reid, JB, CS, Barry Eickenrock, Rob Hukezalie, Harry Baines, AS, Bob Chommers, Ken Rudd, Kevin Jones, Jack Hemmer cc SVE (A/CP)
- " (he dictated ditto)
- Undated mailing list of IHI Central Personnel (WP)
- 12/9/98 Rhonda Peditto copy of email transmission from Rhonda Peditto to AW (A/CP)
- 12/9/98 two-page fax AW to Rhonda Peditto (A/CP)
- 12/9/98 facsimile Peditto to SVE (A/CP)
- 12/4/98 five-page fax Terry Gardner to BEW (A/CP)
- 12/7/98 BEW to SVE (A/CP)
- 12/9/98 nine-page fax Rhonda Peditto to AW (A/CP)
- 12/9/98 seven-page fax Rhonda Peditto to AW partial copy (A/CP)
- 11/30/98 11-page fax Rhonda Peditto to CS (A/CP)
- 12/2/99 correspondence from BEW to SVE (A/CP)
- Correspondence 1 IHI Bankruptcy

- 11/25/98 BEW to JAB cc SVE with enclosures (A/CP)
- 11/25/98 BEW to Betina Lawton cc SVE, CS and LS with enclosures (A/CP)
- 11/25/98 BEW to FDB cc SVE, CS and LS with enclosures (A/CP)
- 11/25/98 BEW to RB cc SVE, CS and LS with enclosures (A/CP)
- 11/25/98 BEW to Susan Halpern cc SVE, CS and LS with enclosures (A/CP)

Mailing Matrix - IHI Bankruptcy

- 11/25/98 Rhonda Peditto email transmission from AEF to Peditto (A/CP)
- 12/1/98 Peditto copy of email transmission from Peditto to Terry Gardner (A/CP)
- 11/30/98 Peditto copy of email transmission from Charnel Baker to Peditto cc Terry Gardner (A/CP)
- 12/1/98 Peditto copy of email transmission from Peditto to Terry Garnder (A/CP)
- 11/30/98 Peditto copy of email transmission from Charnel Baker to Peditto cc Terry Gardner (A/CP)
- Undated name and address list of European individuals with note to Peditto from BEW and handwriting on it (A/CP)(WP)

Attorney Notes

- Various dates handwritten notes of BEW (WP)
- 9/15/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 9/2999 Peditto copy of email transmission from BEW to Peditto (A/CP)
- 6/9/99 Transcript of phone message from Christine at Banktupcy Court to BEW (WP)
- 3/29/99 Copy of IHI notes to consolidate balance sheet dated 7/31/96 attached to billing statement of Wood & Francis (WP)
- 4/27/99 fax cover sheet for three-page fax from BEW to AW (A/CP)
- 3/2899 BEW copy of email transmission from SVE (A/CP)
- 3-28-99 BEW copy of email transmission from SVE with handwritten notes of BEW (A/CP)
- 12/10/98 copy of Chapter 7 bankruptcy form Eastern District of North Carolina re IHI attached to the above emails (WP)
- Undated draft memorandum in support of Plaintiff SVE's Request for Preliminary and Permanent Injunction re IHI Bankruptcy coupled with SVE v. Holmes P. Hardin litigation re bankruptcy (WP)
- 1/20/99 Peditto copy of email transmission from Peditto to Joy Alfred (A/CP)
- 2/1/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 1/22/99 Peditto copy of email transmission from Peditto to Wood & Francis staff and attorneys (A/CP)
- 1/15/99 Peditto copy of email transmission from Joy Alfred to Peditto (A/CP)
- 1/26/99 Peditto copy of email transmission from Peditto to AW (A/CP)
- 1/21/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 1/21/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 1/20/99 Peditto copy of email transmission from RB to BEW and Peditto (A/CP)
- 1/20/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 1/13/99 BEW copy of email transmission from Jenny Johnson with attachments (A/CP)
- 1/7/99 BEW copy of email transmission from Jenny Johnson with attachments (A/CP)
- 1/5/99 BEW copy of email transmission from Jenny Johnson with attachments (A/CP)

- 1/4/99 BEW copy of email transmission from Jenny Johnson with attachments (A/CP)
- 12/11/98 two-page fax from Jennifer Doherty to BEW (A/CP)
- Undated handwritten notes AEF (WP)
- Undated Ginny Marshall copy of email transmission to BEW with handwritten notes to BEW on it (A/CP)
- 12/2/98 Peditto copy of email transmission from AB to Peditto (A/CP)
- 12/1/98 Peditto copy of email transmission from BEW to RB cc Peditto (A/CP)
- 11/25/98 Peditto copy of email transmission from Peditto to Wood & Francis staff and attorneys (A/CP)
- 3/2/99 Internal document of Wood & Francis (WP)
- Documents in Prep of Schedules IHI-Bankruptcy
 - 12/17/98 three-page fax Joy J. Alfred to Brent Wood (A/CP)
 - 12/17/98 14-page fax BEW to Joy/Terry Gardner (A/CP)
- IHI-Bankruptcy Holmes Hardin Ad Selling Doctrine
 - 1/15/99 Chris Reid copy of email transmission from CR to CR (A/CP)

BOX 96W342I 140 / BOX 96W342I 141 IHI Securities - A & B

- Montana State v. IHI Correspondence
 - Undated draft consent agreement and order re In the Matter Of IHI, SVE, CS, LS (A/CP)
 - 8/5/99 21-page fax Linda Deola of Reynolds, Motzel(?) and Sherwood, Attorneys at Law, Helena, Montana to BEW (A/CP)
 - 8/10/99 three-page fax BEW to Johnny Daniel (A/CP)
 - 8/5/99 21-page fax from Linda Deola to BEW (A/CP)
 - 4/23/99 SVE to RB cc Johnny Daniels (A/CP)
 - 4/1/99 34-page fax RB to BEW and SVE (A/CP)
 - 4/6/99 facsimile from BEW to SVE (A/CP)
 - 2/8/99 three-page fax Terry Gardner to BEW (A/CP)
 - 1/22/99 BEW to SVE (A/CP)
 - 4/7/99 BEW to SVE (A/CP)
 - 1/15/99 BEW to SVE (A/CP)
 - 2/9/99 BEW to SVE (A/CP)
 - 1/14/99 three-page fax BEW to RB (A/CP)
 - 4/28/98 18-page fax GMM to BEW and FDB (A/CP)
 - 4/17/98 IHI Memo from GMM to SVE, CR, BEW, FDB and RB marked Confidential -Attorney Work Product (A/CP)
 - 5/6/98 five-page fax GMM to BEW (A/CP)
 - 4/20/98 23-page fax GMM to SVE and BEW (A/CP)
 - 5/1/98 nine-page fax to BEW, CR and JB from SVE? (A/CP)
 - 4/15/98 five-page fax CR to BEW and FDB (A/CP)
 - 4/8/98 15-page fax AW to BEW (A/CP)
 - 4/6/98 20-page fax FDB to BEW (A/CP)

- 11/25/98 four-page fax BEW to FDB (A/CP)
- 11/12/98 FDB to SVE cc BEW, CS and LS (A/CP)
- 11/12/98 " with note from SVE to BEW (A/CP)
- 9/17/98 two-page fax CR to FDB cc BEW (A/CP)
- 9/30/98 BEW to CR and JB with enclosure (A/CP)
- 9/30/98 four-page fax BEW to CR (A/CP)
- 5/27/98 five-page fax Pete Scanlon to BEW (A/CP)
- 4/7/98 four-page fax CR to BEW (A/CP)
- 4/15/98 two-page fax BEW to FDB (A/CP)
- 4/15/98 two-page fax BEW to CR (A/CP)
- 4/15/98 BEW to JB (A/CP)
- 4/10/98 seven-page fax BEW to JB (A/CP)
- . Montana State Auditor v. IHI, et al. Attorney Notes
 - 4/12/99 Transcript of voice mail message from Lyn Deola to BEW (A/CP)
 - 4/7/99 Handwritten notes BEW (WP)
 - 1/5/99 Handwritten notes BEW (WP)
 - 1/5/99 Handwritten notes BEW (WP)
 - 4/15/98 Handwritten notes BEW (WP)
- · Montana State Auditor v. IHI Research
 - 11/10/98 Approximately 700 pages of research downloaded from Lexis relating to Montana state codes and securities regulations (WP)
- Securities Van Etten General
 - 4/21/99 Miscellaneous handwritten notes (WP)
 - 4/23/99 two-page fax from Dawn McIntyre to BEW (A/CP)
 - Undated handwritten note BEW (WP)
 - 8/11/98 23-page from CR to BEW (A/CP)
 - 1/23/99 BEW copy of correspondence from SVE to Hunter Wiche, Esq. (A/CP)
 - 1/20/99 Peditto copy of email transmission from Peditto to Joy Alfred (A/CP)
 - 2/9/99 transcript of voice mail from BEW to Gene Davis (A/CP)
 - 2/3/99 statement of legal fees from Johnson, Mercer, Hearn & Vinegar to IHI c/o BEW
 (A/CP)
 - 2/24/99 three-page fax from CR to Peditto (A/CP)
 - 2/24/99 BEW copy of correspondence from SVE to Rob Hukezalie Dynamic Essential and JB cc BEW (A/CP)
 - 2/25/99 two-page fax CR to BEW (A/CP)
 - 10/22/98 two-page fax from Joe McLeod(?) to BEW with handwritten note BEW (WP)
 - 9/29/98 eight-page fax GMM to BEW and RB (A/CP)
 - · Undated two drafts of press release with handwritten notes of BEW on each
 - 1/25/99 handwritten notes BEW (WP)
 - 1/28/99 BEW to SVE cc RB (A/CP)
 - Miscellaneous handwritten notes BEW (WP)

- Securities Van Etten Marsh Action
 - 3/16/99 four-page fax BEW to AW (A/CP)
 - 3/16/99 BEW to Halpern cc SVE, LS and CS (A/CP)
 - 3/16/99 BEW to SVE and LS (A/CP)
 - Miscellaneous handwritten notes BEW (WP)
- Securities Van Etten SEC Action
 - Variously dated handwritten notes BEW (WP)
 - 10/9/97 chart of IHI Disciplinary Action (WP)
 - 5/19/97 copy of draft letter to Dwinna Williams, State of Tennessee, Division of Consumer Affairs from CR cc SVE, FDB and JAB (WP)
 - 5/9/97 copy of correspondence from Dwinna Williams to IHI re Harry Carrell (A/CP)
 - Undated IHI Memo to IHI Leaders re Summer Promotion attached to handwritten notes of BEW with its own large attachment (WP)
- Securities Van Etten Meckenstock Action
 - 1/8/99 handwritten notes BEW (WP)
- SEC Smith, Larry
 - Undated copy of South Carolina Court of Appeals decision (WP)
 - Undated copy of South Carolina Statute section (WP)
 - 3/5/99 Wood & Francis billing statement to LS (A/CP)
- Securities Van Etten Internet Research
 - 1/19/99 copy of NC Court of Appeals decision with handwritten note from BEW to Peditto attached (WP)
 - Undated article on Illegal Pyramid Schemes (WP)
 - Undated list of internet links to articles on IHI (WP)
- Van Etten Securities Information from Bisbys
 - 1/15/99 BEW copy of faxed handwritten note from the Bisbys to SVE (A/CP)
- 60 Minutes
 - 5/13/99 BEW transcript of message from Dawn McIntyre (A/CP)
 - 6/4/99 five-page fax from SVE to BEW (A/CP)
 - 5/15/99 six-page fax from SVE to BEW (A/CP)
 - 6/3/99 BEW copy of faxed correspondence from SVE to Mike Wallace, Co-Editor, 60 Minutes (A/CP)
 - Various dated handwritten notes BEW (WP)
 - 7/15/96 SEC Form S-1 re IHI with handwritten notes BEW and disbursed and attached to 3/6/98 SEC Form 8-K (WP)

- Undated copy of items from CBS.com (WP)
- 5/12/99 five-page fax BEW to SVE copy of pages from CBS.com (WP)

BOX 96W342I 142

- IHI General/Correspondence 6
 - Undated report on WRAL News transcript with handwritten notes (WP)
 - Undated draft complaint SVE v. Stuart Watson, Capital Broadcasting Company with handwritten notes and edits (WP)
 - 11/25/98 two-page fax Dawn McIntyre to BEW (A/CP)
 - 11/24/98 two-page fax AW to BEW (A/CP)
 - 11/24/98 two-page fax AW to BEW (A/CP)
 - 11/24/98 correspondence BEW to Betina Lawton cc SVE (A/CP)
 - 11/24/98 BEW to James Martin, Esq. cc SVE (A/CP)
 - 11/24/98 BEW to DL ∝ SVE (A/CP)
 - 11/24/98 BEW to RB cc SVE (A/CP)
 - 11/24/98 BEW to Susan Halpern cc SVE (A/CP)
 - Undated draft General Release (A/CP)
 - 11/19/98 three-page fax BEW to SVE cover page (A/CP)
 - 10/30/98 20-page fax BEW to Terry Gardner (A/CP)
 - 11/17/98 fax access authorization page from Infostor three pages (A/CP)
 - 11/19/98 seven-page fax Terry Gardner to BEW (A/CP)
 - 11/18/98 14-page fax Terry Gardner to BEW (A/CP)
 - 11/17/98 three-page fax AW to BEW (A/CP)
 - 11/16/98 three-page fax from LWB to GMM, AW and BEW (A/CP)
 - 11/30/98 eight-page fax IHI to BEW (A/CP)
 - 11/12/98 FBD to SVE cc BEW (A/CP)
 - 11/10/98 two-page fax Betina Lawton to BEW (A/CP)
 - 11/10/98 AS to BEW (A/CP)
 - Undated handwritten note from BEW to Sabrina Wei (A/CP)
 - 11/7/98 four-page fax Dawn McIntyre and SVE to BEW (A/CP)
 - 10/30/98 GMM to Charles H. Mercer cc BEW, Rob Hukezalie and Debbie Blevins (A/CP)

Correspondence 7

- 4/30/98 four-page fax RSH to BEW (A/CP)
- 1/19/99 BEW to SVE (A/CP)
- 1/15/99 BEW to CS (A/CP)
- 1/15/99 BEW to LS (A/CP)
- 1/5/99 two-page fax Terry L. Gardner to BEW (A/CP)
- 1/15/99 nine-page fax Diane Pace to Rhonda Peditto (A/CP)
- 1/8/99 BEW to SVE cc AEF and CTF marked Personal & Confidential (A/CP)
- 1/7/99 Peditto copy of email transmission from Peditto to Diane Pace with attachment (A/CP)
- 1/8/99 two pages of 18-page fax from BEW to Diane Pace (A/CP)
- 1/4/99 10-page fax BEW to Diane Pace (A/CP)

- 1/4/99 copy of Form U4 Uniform Application for Securities Industry Registration of Transfer – first page with two yellow Post-Its bearing handwritten notes of BEW attached (WP)
- Miscellaneous handwritten notes BEW (WP)
- 11/23/98 two-page fax from Rob Hukezalie to BEW (A/CP)
- 12/8/98 three-page fax from SVE to BEW (A/CP)
- 10/20/98 four-page CR to BEW cc GMM and SVE (A/CP)

Attorney Notes

- 5/26/99 Peditto copy of email transmission from Peditto to Ginny Marshall (A/CP)
- 5/26/99 Peditto copy of email transmission from Peditto to Ginny Marshall (A/CP)
- 5/26/99 Peditto copy of email transmission from Peditto to Ginny Marshall (A/CP)
- 5/26/99 Peditto copy of email transmission from Peditto to Ginny Marshall (A/CP)
- 5/29/99 Peditto copy of email transmission from BEW to Peditto cc Anna Taylor (A/CP)
- 10/22/98 handwritten notes AEF (WP)
- Undated transcript of voice mail left by Alex Rue for Mr. and Mrs. Brown (WP)
- 4/23/99 transcript of voice mail message from Steve Reid to BEW (WP)
- 2/1/99 handwritten notes BEW (WP)
- Variously dated handwritten notes of BEW (WP)
- 2/5/99 transcript of voice mail message from Janice Houvener to BEW (A/CP)
- 1/28/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
- 1/26/99 Peditto copy of email transmission from Anna Washburn with attachment (A/CP)
- 12/22/98 Peditto copy of email transmission from Peditto to AW (A/CP)
- 12/22/98 Peditto copy of email transmission from Rhonda Peditto to AW (A/CP)
- 12/16/98 AW to BEW three-page fax (A/CP)
- 9/3/98 handwritten notes AEF (WP)
- 12/16/97 transcript voice message from AS to BEW with handwritten notes BEW on it and attached to BEW handwritten notes (WP)
- 11/24/97 IHI Memo Jeff Trendel to GMM cc JB with attachments (A/CP)
- Undated draft Voluntary Petition for Bankruptcy with handwritten notes BEW (WP)
- 9/21/98 IHI Board of Directors Meeting Agenda with handwritten notes BEW attached (WP)
- 4/19/98 BEW plane ticket (A/CP)
- 4/20/98 BEW plane ticket (A/CP)
- 4/27/98 BEW plane ticket or boarding pass (A/CP)
- 4/27/98 BEW flight itinerary (A/CP)
- 4/18/98 BEW American Airlines boarding pass (A/CP)
- 4/16/98 BEW travel itinerary (A/CP)
- Undated North Carolina General Statutes copy (A/CP)
- Contract with Contractor-Employees
 - 11/10/98 GMM to SVE with handwritten note on yellow Post-It from BEW attached (A/CP)
- Mollick, Georgina IHI Gen

- 8/3/98 copy of front page of letter to SVE with notes to and from SVE to GMM on yellow-Post-It attached (A/CP)
- 10/16/98 Julie Bell to GMM cc BEW with enclosure (A/CP)
- 10/16/98 Internal document of GMM (WP)(A/CP)
- Client Documents IHI-Gen
 - 11/13/98 fax cover page of eight-page fax from IHI to BEW (A/CP)
 - 11/3/98 four-page fax JAB to SVE and JB (A/CP)
 - 11/3/98 correspondence from SVE to & Associates (A/CP)
 - 11/3/98 correspondence from SVE to Dechert, Price & Rhoades (A/CP)
 - 11/3/98 SVE to Kutuck, Rock (A/CP)
 - 11/3/98 SVE to BEW of Wood & Francis (A/CP)
 - 11/3/98 SVE to FDB (A/CP)
- Bridge Loan Financing
 - 6/23/98 three-page fax GMM to BEW (A/CP)
 - 6/23/98 four-page fax BEW to BEW (A/CP)
- Miscellaneous Documents
 - 12/16/97 10-page fax IHI to BEW (A/CP)
 - 11/21/97 three-page fax CR to BEW (A/CP)
 - 9/26/97 CR to BEW (A/CP)
- Ackle, Barry IHI General
 - 10/12/98 copy of handwritten note or message from Barry Ackle (IHI employee) to BEW attached to an Option to Purchase (A/CP)
 - 10/12/98 copy of handwritten note from Barry Ackle to BEW with 5/26/97 Receipt and Agreement of Sale attached (A/CP)
- Sheu Hong Yip
 - 12/1/98 16-page fax RB to BEW (A/CP)
 - 10/22/98 correspondence GMM to BEW and RB with enclosure cc CR without enclosure (A/CP)
- Invoices for Shustak, Jalil and Heller
 - 11/1/98 Shustack, Jalil and Heller to CR (A/CP)
- Returned Checks for Deposit for IHI
 - 11/20/98 Memo from Peditto to BEW cc Angie Cox (A/CP)
 - 11/17/98 Memo from Peditto to BEW cc Angie Cox (A/CP)

- 11/13/98 Wood & Francis Trust Account Statement (A/CP)
- 11/13/98 Transaction Inquiry (A/CP)
- 11/12/98 Transaction Inquiry (A/CP)
- 11/12/98 Transaction Inquiry (A/CP)
- 11/12/98 Memo Peditto to BEW (A/CP)
- 11/16/98 Wood & Francis Trust Account Statement (A/CP)
- 11/16/98 Wood & Francis Trust Account Statement (A/CP)
- 11/16/98 Wood & Francis Trust Account Statement (A/CP)

Deposits for IHI

• 11/23/98 Peditto copy of email transmission BEW to Angie Cox cc Peditto (A/CP)

IHI – General

- 7/7/98 FDB to CR cc SVE and BEW (A/CP)
- 2/16/98 FDB to CR (A/CP)
- 1/16/98 FDB to CR with enclosure (A/CP)
- 1/29/98 two-page fax FDB to BEW (A/CP)
- 11/3/98 two-page fax BEW to SVE (A/CP)
- 11/3/98 two-page fax BEW to John S. Smith, III, Office of Consumer Affairs, Consumer Protection * Document missing
- 1/14/98 CR to SVE and JB cc Derek Striker, Peter Scanlon, BEW and FDB (A/CP)
- 1/16/98 seven-page fax FDB to BEW (A/CP)
- 1/13/98 BEW to FDB and CR (A/CP)
- 1/9/98 FDB to SVE (A/CP)
- 12/17/97 FDB to CR (A/CP)
- 2/4/98 CR to FDB with enclosure (A/CP)
- 10/30/97 two-page fax BEW to CR (A/CP)
- 10/30/97 BEW to CR (A/CP)
- 10/15/97 IHI Memo Jennifer Gruver to Pete Scanlon and CR with attachment re Georgia expenses (A/CP)
- 10/7/97 34-page fax BEW to Robin Land, IHI employee only 8 pages (A/CP)
- 9/9/97 CR to JAB, FDB, BEW with enclosures (A/CP)
- 9/5/97 14-page fax CR to BEW (A/CP)
- 9/5/97 12-page fax JAB to BEW (A/CP)
- 9/5/97 BEW copy of correspondence JAB to John S. Smith, Counsel and Division Director, Bureau of Consumer Protection, Georgia cc SVE, CR, JB, FDB and BEW with enclosures (A/CP)
- 9/2/97 four-age fax AS to BEW (A/CP)
- 9/2/97 SVE to BEW with enclosure (A/CP)
- 8/6/97 17-page fax SVE to BEW (A/CP)
- 8/7/97 FDB to SVE (A/CP)
- 8/23/97 DA to JAB cc SVE, CR and FDB (A/CP)
- 8/25/97 four-age fax AW to BEW (A/CP)
- 8/26/97 seven-page fax JAB to BEW (A/CP)
- 8/5/97 IHI Memo CR to All Field Trainers cc SVE, JB, Jeff Hooks and Peter Scanlon re Georgia training issues (A/CP)

- 8/26/97 BEW copy of JAB to John S. Smith, III cc SVE, CR, JB and FDB with enclosures (A/CP)
- 9/5/97 SVE to JAB, FDB and BEW with enclosures (A/CP)

· Attorney Notes

- 1/19/98 handwritten notes BEW with draft letter BEW to FDB and CR (WP)
- 12/19/97 handwritten notes BEW with draft Assurance of Voluntary Compliance for Kozdom, Inc. of Georgia (WP)
- 8/28/97 handwritten notes BEW (WP)
- 8/8/97 handwritten notes BEW (WP)
- 8/7/97 handwritten notes BEW (WP)
- 8/6/97 handwritten notes BEW (WP)
- Criminal Investigation Van Etten
 - 10/21/99 BEW to Wade Smith, Melissa Hill, Esq. with enclosures cc SVE via email (A/CP)
 - 5/13/99 handwritten notes BEW (WP)
 - 5/13/99 correspondence Wade M. Smith and Melissa Hill to SVE (A/CP)
 - 11/2/99 transcript of voice mail message from Melissa Hill to BEW (A/CP)
 - 5/25/99 Peditto copy of email transmission from Peditto to BEW (A/CP)
 - Undated copy of Wade Smith index (WP)
 - Miscellaneous check list of items for Wade Smith (WP)
 - Undated pleadings index ______, et al. v. F & Wolf & Company, et al. (WP)
 - Undated pleadings index (WP)

BOX 96W342I 143

- Correspondence 15
 - 6/22/99 BEW to SVE (A/CP)
 - 5/28/99 37-page fax from RB to BEW (A/CP)
 - 5/26/99 RB to SVE cc BEW with enclosures and handwritten notes from BEW on document (A/CP)
 - 5/24/99 34-page fax from RB to BEW (A/CP)
 - 5/19/99 Memo from BEW to Alan Woodlief (A/CP)
 - 5/17/99 RB to Rhonda Peditto cc BEW and SVE (A/CP)
 - 5/4/99 five-page fax from RB to BEW (A/CP)
 - 4/8/99 three-page fax from Paul Fanning, Esq. to BEW (A/CP)
 - 4/20/99 two-page fax from SVE to BEW (A/CP)
 - 4/19/99 two-page fax from RB to Thomas Fleming, William Hicks, BEW and SVE (A/CP)
 - 4/28/99 BEW to RB cc SVE (A/CP)
 - 4/28/99 BEW to SVE (A/CP)
 - 3/9/99 Thomas Fleming to RB cc Steven Bayern and Al Barbera (A/CP)
 - 4/9/99 four-page fax from Peditto to RB (A/CP)
 - 4/7/99 BEW to SVE (A/CP)

- 4/1/99 four-page fax from BEW to SVE (A/CP)
- 3/30/99 Paul Greenberg to RB and BEW (A/CP)
- 3/22/99 four-page fax from RB to BEW (A/CP)
- 3/22/99 BEW copy of letter from RB to Luther D. Thomas, Clerk, U.S. District Court, Northern District of Georgia cc BEW (A/CP)
- 3/19/99 RB to Thomas Fleming oc BEW, William P. Hicks and SVE (A/CP)
- 3/11/99 three-page fax RB to BEW (A/CP)
- 2/9/99 21-page fax from FDB to BEW (A/CP)
- 3/18/99 BEW to RB cc SVE (A/CP)
- 3/17/99 Peditto to RB (A/CP)
- 3/16/99 three-page fax RB to Thomas Fleming, BEW and William Hicks (A/CP)
- 3/3/99 copy of email transmission page with handwritten note of Peditto on yellow Post-It attached (A/CP)
- 1/26/99 12-page fax Peditto to AW (A/CP)
- 1/19/99 BEW to SVE (A/CP)
- 1/4/99 GMM to BEW with enclosure (A/CP)

SEC v. IHI - Attorney Notes 2

- Various handwritten notes from BEW (WP)
- 5/31/99 Memo from Alan Woodlief to BEW (A/CP)
- 5/17/99 Peditto copy of email transmission from Peditto to RB (A/CP)
- 6/22/99 Peditto copy of email transmission from Peditto to BEW with handwritten notes of BEW (A/CP)
- 5/27/99 Peditto copy of email transmission from Anna Taylor to BEW cc Peditto (A/CP)
- 6/1/99 18-page fax from BEW to RB (A/CP)
- 5/26/99 four-page fax from BEW to RB (A/CP)
- 5/17/99 BEW copy of email transmission from SVE to BEW (A/CP)
- 5/10/99 three-page fax RB to William Hicks and BEW (A/CP)
- 4/20/99 Peditto copy of email transmission from RB to BEW cc Peditto (A/CP)
- 3/18/99 Memo from BEW to CR cc AEF (A/CP)
- 3/8/99 BEW copy of email transmission from RB to BEW (A/CP)
- 3/8/99 BEW copy of email transmission from RB to BEW cc Courtney E. Sheehan (A/CP)
- 2/23/99 two-page fax BEW Peditto to Jim Roberts (A/CP)
- 2/1/99 transcript of message from John Wells (60 Minutes) to BEW (WP)
- 6/12/98 SEC Litigation Release No.: 15694 (WP)
- Miscellaneous and undated handwritten notes AEF (WP)
- Undated draft Plaintiff-Appellant's Brief to the North Carolina Court of Appeals re George L. Gaunt, et al. v. Donald E. Pittaway, Nancy O. Teaff, et al. with handwritten notes and edits from BEW and John Austin (WP)
- Undated outline for response to Lloyd Whitaker Report (WP)
- Undated draft Second Report to Lloyd T. Whitaker Pursuant to etc. bearing handwritten notes of BEW (WP)
- 8/12/98 Memo from AEF to BEW (WP)(A/CP)
- 9/3/98 nine-page fax RB to BEW (A/CP)
- Undated AEF Schedule of SEC Subpoenas and Depositions (WP)
- 7/22/98 Memo AEF to BEW (WP)(A/CP)

- 7/22/98 Draft Motion to Quash Subpoena and for Protective Order with handwritten note from Alan Woodlief and AEF on yellow Post-It to BEW attached (WP)
- 6/1/98 copy of Plaintiff's First Set of Interrogatories to Defendant IHI in the SEC v. IHI, et al. litigation bearing handwritten notes BEW (WP)

SEC v. IHI - Attorney Notes

- Variously dated handwritten notes of BEW (WP)
- 12/1/98 Peditto copy of email transmission from BEW to RB cc Peditto (A/CP)
- Undated draft Defendant Stanley Van Etten's Response to Plaintiff's First Set of Interrogatories (WP)
- 6/29/98 three-page fax RB to BEW and Ms. Eisenberg bearing handwritten notes from BEW (WP)
- 3/28/98 billing invoice of Paul Greenberg to IHI
- 5/11/98 seven-page fax from Joel B. Piassick to BEW and Lloyd T. Whitaker with handwritten note of 5/12/98 from BEW
- Undated miscellaneous business cards and contact information (WP)
- 4/29/98 Tarkington copy of email transmission from AW to Elaine Tarkington (A/CP)
- 4/29/98 13-page fax from RB to BEW with handwritten notes of BEW (WP)
- 4/14/98 draft of Corporate Up-Date with handwritten notes of BEW (WP)
- 4/13/98 six-page fax from Marks Lane to BEW with handwritten notes of BEW (WP)
- 4/8/98 four-page fax from AS to Elaine Tarkington with handwritten notes of BEW (WP)
- 3/6/98 15-page fax from RB to BEW with handwritten notes of BEW (WP)
- Undated seven-page fax from D.J. Gellen to BEW, CR and FDB (A/CP)
- Undated outline for hearing on Preliminary Injunction SEC v. IHI (WP)
- Undated outline for hearing on preliminary injunction SEC v. IHI with handwritten notes
 of BEW marked Confidential and Privileged (WP)
- 3/21/98 list of items sent by Plain with handwritten notes of GMM (WP)
- Undated handwritten notes GMM (WP)
- SEC Georgia Action No.: 1:98-0803-CV-RWS IHI (Discovery Responses)
 - 10/13/98 correspondence from GMM to BEW marked Confidential Attorney Work Product with enclosures

Correspondence 2

- 11/1/99 correspondence BEW to SVE (A/CP)
- 11/1/99 BEW to LS (A/CP)
- 11/1/99 BEW to CS (A/CP)
- 10/19/99 BEW to SVE with enclosures (A/CP)
- 10/19/99 BEW to LS (A/CP)
- 10/19/99 BEW to CS (A/CP)
- 10/12/99 \$275,000 check from Executive Risk Guaranty, Inc. to Wood & Francis, PLLC (A/CP)
- 9/24/99 BEW to SVE with enclosure (A/CP)
- 9/24/99 BEW to LS (A/CP)
- 9/24/99 BEW to CS (A/CP)

- 9/10/99 BEW to SVE, LS and CS (A/CP)
- 9/10/99 BEW to SVE, LS and CS (A/CP)
- 9/3/99 BEW to CS (A/CP)
- 9/3/99 BEW to LS (A/CP)
- 9/3/99 BEW to SVE (A/CP)
- 8/26/99 BEW to SVE, LS and CS (A/CP)
- 8/26/99 BEW to SVE, LS and CS (A/CP)
- 8/26/99 BEW to SVE, LS and CS (A/CP)
- 6/7/99 handwritten notes BEW (A/CP)
- 5/27/99 BEW to LS with enclosure (A/CP)
- 5/27/99 BEW to CS with enclosure (A/CP)
- 5/27/99 BEW to SVE (A/CP)
- 5/27/99 BEW to James R. Roberts, III, Esq., James T. Johnson, Esq. of Lewis and Roberts (A/CP)

Correspondence - Executive Risk I

- 5/21/99 Memo BEW to Alan Woodlief (A/CP)
- 2/17/99 draft correspondence BEW to Lisa A. Burns, Esq. and Mr. Joseph W. Eason and Jonathan Sasser with enclosure and handwritten notes BEW (A/CP)
- 4/17/99 BEW to SVE, LS c/o Ryan Smith and CS (A/CP)
- 2/9/99 handwritten notes BEW (WP)
- 2/2/99 BEW to SVE, LS and CS (A/CP)
- 1/11/99 BEW to SVE, LS and CS (A/CP)
- 5/21/99 Memo BEW to Alan Woodlief (A/CP)
- 2/17/99 draft letter from BEW to Holmes Harden Esq. (WP)
- 2/17/99 draft letter from BEW to SVE, CS & LS c/o Ryan Smith with attachment (WP)
- 5/21/99 Miscellaneous handwritten notes BEW (WP)
- 8/3/99; 7/7/99; 7/26/99 handwritten notes of BEW (WP)
- 12/1/98 BEW to SVE, LS and CS (A/CP)
- 10/27/98 two pages of 10-page fax from BEW to Alan Woodlief (A/CP)
- 9/30/98 13-page fax from Alan Woodlief to Elaine Tarkington handwritten notes BEW
 (A/CP)
- 9/29/98 13-page fax from Alan Woodlief to Elaine Tarkington handwritten notes Alan Woodlief (A/CP)
- 9/14/98 BEW to GMM cc with enclosure Rob Hukezalie cc JB without enclosure (A/CP)
- 8/26/98; 7/31/98 handwritten notes of BEW (WP)(A/CP)
- 7/21/98 three-page fax from GMM to BEW with handwritten notes BEW (WP)
- 8/4/98 Wood & Francis internal document (WP)

Docs Sent to Lewis & Roberts - Exec. Risk

- 2/11/99 Peditto copy of email transmission from RB to Peditto (A/CP)
- 7/21/98 three-page fax from GMM to BEW (A/CP)

Miscellaneous Documents

9/21/98 AEF copy of email transmission from Peter Scanlon to AEF (A/CP)